TSD File Inventory Index

Date: July 12, 2000

Initial: CMHenenlaz

Facility Name: Anaconda-Ericsson, Inc (One Folder Site)

Facility Identification Number: ILD 062 404 608

A.1 General Correspondence	X	**B.2 Permit Docket (B.1.2)**	
A.2 Part A / Interim Status	X	.1 Correspondence	
.1 Correspondence	X	.2 All Other Permitting Documents (Not Part of the ARA)	
.2 Notification and Acknowledgment	X	**C.1 Compliance - (Inspection Reports)**	
.3 Part A Application and Amendments	X	**C.2 Compliance/Enforcement**	
.4 Financial Insurance (Sudden, Non Sudden)		.1 Land Disposal Restriction Notifications	
.5 Change Under Interim Status Requests		.2 Import/Export Notifications	
.6 Annual and Biennial Reports		**C.3 FOIA Exemptions - Non-Releasable Documents**	
A.3 Groundwater Monitoring		**D.1 Corrective Action/Facility Assessment**	X
.1 Correspondence		.1 RFA Correspondence	
.2 Reports		.2 Background Reports, Supporting Docs and Studies	
A.4 Closure/Post Closure		.3 State Prelim. Investigation Memos	
.1 Correspondence		.4 RFA Reports	X
.2 Closure/Post Closure Plans, Certificates, etc		**D. 2 Corrective Action/Facility Investigation**	
A.5 Ambient Air Monitoring		.1 RFI Correspondence	
.1 Correspondence		.2 RFI Workplan	
.2 Reports		.3 RFI Program Reports and Oversight	
B.1 Administrative Record		.4 RFI Draft /Final Report	

Total - 1

.5 RFI QAPP		.6 CMI QAPP	
.6 RFI QAPP Correspondence		.7 Lab Data, Soil-Sampling/Groundwater	
.7 Lab Data, Soil-Sampling/Groundwater		.8 Progress Reports	
.8 RFI Progress Reports		**D.5 Corrective Action/Enforcement**	
.9 Interim Measures Correspondence		.1 Administrative Record 3008(h) Order	
.10 Interim Measures Workplan and Reports		.2 Other Non-AR Documents	
D.3 Corrective Action/Remediation Study		**E. Boilers and Industrial Furnaces (BIF)**	
.1 CMS Correspondence		.1 Correspondence	
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.4 CMS Draft/Final Report		**G.1 Risk Assessment**	
.5 Stabilization		.1 Human/Ecological Assessment ...	
.6 CMS Progress Reports		.2 Compliance and Enforcement ...	
.7 Lab Data, Soil-Sampling/Groundwater		.3 Enforcement Confidential	
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.1 CMI Correspondence		.5 Permitting	
.2 CMI Workplan		.6 Corrective Action/Remediation Study ...	
.3 CMI Program Reports and Oversight		.7 Corrective Action Remediation Implementation ...	
.4 CMI Draft/Final Reports		.8 Endangered Species Act	
.5 CMI QAPP		.9 Environmental Justice	

Note: Transmittal Letter to Be Included with Reports.

Comments: Documents do not justify individual file/schedule.

A.1 Public Participation

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO ATTENTION OF:

JUN 1 6 1982.

CERTIFIED MAIL
Return Receipt Requested

Mr. Walter J. Plate, Vice President
Anaconda Ericsson, Inc.
Greenwich Office Park 3
Greenwich, Connecticut 06830

Dear Mr. Plate:

This is to notify you of my determination regarding Anaconda Ericsson, Inc.'s claim of business confidentiality for information contained in its Part A Resource Conservation and Recovery Act permit application for installation ILD062406608.

I am denying this claim because Anaconda Ericsson has not satisfactorily shown that disclosure of the information claimed confidential is likely to substantially harm its competitive position. 40 C.F.R. § 2.208(e)(1).

If you have any questions, please call Mary Gade of my staff at 312/886/6668.

Sincerely,

Robert B. Schaefer
Regional Counsel

Enclosure

cc: Mark Valentine

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

IN RE: ANACONDA ERICSSON ILD062406608	REGIONAL COUNSEL'S DETERMINATION OF LEGAL ISSUES IN A CLAIM OF BUSINESS CONFIDENTIALITY

Section 3005 of the Resource Conservation and Recovery Act of 1976, as amended, (42 U.S.C. § 6901 et seq.) (RCRA) requires that each person owning or operating a facility for the treatment, storage, or disposal of a hazardous waste have a permit. Section 3005 of RCRA also establishes a condition known as "interim status" which allows existing hazardous waste management facilities to continue their operations until a final hazardous waste permit is issued. In order to qualify for interim status, among other things, owners and operators of existing hazardous waste management facilities were required to complete and sign Part A (Forms 1 and 3) of EPA's Consolidated Permit Application and submit it to EPA by November 19, 1980. (45 Fed. Reg. 33084).

On November 17, 1980, Anaconda Ericsson submitted the required Part A permit application to the EPA Region V Regional Administrator, together with a claim of business confidentiality on certain items in the application. The following items are included in the information required in the RCRA Part A permit application:

Form 1

I. EPA I.D. Number
II. Pollutant Characteristics to determine which supplementary forms must be filed.
III. Name of Facility

IV. Name, title, and work telephone number of person to contact for information about the permit application.
V. Facility Mailing Address.
VI. Facility Location.
VII. List of four 4-digit standard industrial classification (SIC) codes best describing facility.
VIII. Operator Information:

A. Name of the person, firm, public organization or other entity which operates the facility.
B. Indication whether the entity which operates the facility also owns it.
C. Indication of the legal status of the operator of the facility.
D-H. Telephone number and address of the facility operator.

IX. Indication whether the facility is on Indian lands.
X. Numbers from any presently effective environmental permits or permit applications.
XI. Topograhic Map extending at least one mile beyond property boundaries showing outline of facility, the location of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids undergound.
XII. Brief description of nature of business.
XIII. Certification.

Form 3

I. EPA Identification Number
II. Indication that this is the first application for the facility.
III. Process codes and design capacities.
IV. Description of Hazardous Waste:

A. EPA Hazardous Waste Numbers
B. Estimated Annual Quantity of Waste
C. Unit of Measure
D. Process code or description indicating how the waste will be stored, treated and/or disposed at the facility

V. Facility Drawing
VI. Photographs delineating all existing structures, all treatment, storage, and disposal areas and sites of future treatment, storage, and disposal
VII. Facility topographic location in latitude and longitude.
VIII. Facility owner
IX. Owner certification
X. Operator certification

Anaconda Ericsson has made a claim of business confidentiality with respect to Form 3, Items IV, V and VI. Anaconda Ericsson's substantiation of

these claims consists of answers to questions listed in the instructions to the Part A application form, EPA Forms 3510-1 and 3510-3. These questions were based on 40 C.F.R. § 2.204(e), the EPA regulation describing the information which EPA solicits from persons making confidentiality claims. Anaconda Ericsson elected not to respond to a May 10, 1982 letter requesting additional substantiation by June 1, 1982.

EPA may withhold from disclosure under the Freedom of Information Act, 5 U.S.C. § 552, any records which fall within one of the exemptions under the Act. One of these exemptions is "trade secrets and commercial or financial information obtained from a person and priveleged or confidential." 5 U.S.C. § 552(b)(4). Further, the Trade Secrets Act, 18 U.S.C. § 1905, imposes a criminal penalty on agency employees who disclose trade secrets unless "authorized by law." EPA regulations on Confidentiality of Business Information, 49 C.F.R. Part 2, Subpart B, set forth guidelines for determining whether information is entitled to confidential treatment under both the Freedom of Information Act and the Trade Secrets Act. 40 C.F.R. § 2.205(e).

EPA regulations, 40 C.F.R. § 2.208, give substantive criteria for use in confidentiality determinations. First, the person or company making the claim of confidentiality must show that it has taken reasonable measures to protect the confidentiality of the information, that it intends to continue to take such measures, and that the information is not, and has not been, reasonably obtainable without the claimant's consent (except by government bodies or through discovery in a judicial or quasi-judicial proceeding) by use of legitimate means.

Anaconda Ericsson has not demonstrated that these criteria have been met. Anaconda Ericsson merely states that it does not "normally" disclose this information to others and that this information has not been disclosed

to others in the past. Nonetheless, even assuming that Anaconda Ericsson has nominally satisfied this criterion, one of two additional tests must also be met: the claimant must show that disclosure of the information is likely to cause substantial harm to its competitive position, or, if the information is voluntarily submitted information according to 40 C.F.R. § 2.201(i), that its disclosure would be likely to impair the government's ability to obtain necessary information in the future. Since a permit application is required by Section 3005 of RCRA, the information contained therein is not voluntarily submitted information. Therefore, it is necessary to determine whether Anaconda Ericsson has shown that disclosure of the information subject to the confidentiality claim is likely to cause substantial harm to its competitive position. Anaconda Ericsson's November 17, 1980 substantiation fails to make this demonstration.

Anaconda Ericsson raises only one argument in support of its claim that Form 3, Items IV, V, and VI should be held as confidential. It makes a brief, conclusory statement that disclosure of the information in these items could indicate both production methods and capacities to competitors. This substantiation forms an insufficient basis for a determination that release of any or all of the information claimed confidential would cause substantial harm to Anaconda Ericsson's competitive positon. Each of the Items claimed confidential is discussed below in light of the substantiation.

ITEM IV

Anaconda Ericsson claims that the description of hazardous wastes would reveal production methods and capacities to competitors. Anaconda Ericsson, however, does not specify what information will be revealed or why this information would be proprietary. Without this information, I can neither conclude that this information reveals anything about Anaconda Ericsson's

production methods to competitors nor that such information is proprietary. Although the information in Item IV would reveal the amounts of hazardous waste handled, Anaconda Ericsson has not demonstrated why release of this information would harm its competitive position.

Items V and VI

Anaconda Ericsson also claims that release of its facility drawing and photograph would reveal proprietary production methods and capacities to competitors. The information in Item V consists of a general diagram of the facility indicating the location of various operations. The operations are indicated by boxes with general labels like "main plant" and "storage area." Similarly, the facility photograph is merely a ground level photograph of the outside of a building. Without further clarification from Anaconda Ericsson, I cannot conclude that either the drawing or this photograph reveal any proprietary information on production methods and capacities.

As discussed above, Anaconda Ericsson's substantiation is not supported by facts which demonstrate that release of the information subject to the claim of confidentiality would result in harm to its competitive position. The burden of proving that information subject to a claim of confidentiality is entitled to confidential treatment is clearly on the party asserting the claim. This party is in the best position to demonstrate the potential adverse effect of disclosure on its competitive position. 40 C.F.R. § 2.208(e)(1). Claims of confidentiality must be substantiated at the time the permit application is submitted. 40 C.F.R. § 122.19(d)(1). Although Anaconda Ericsson had two opportunities to substantiate its claim, it has failed to meet the burden of proof.

This determination constitutes a notice of denial of Anaconda Ericsson's claim of business confidentiality pursuant to 40 C.F.R. § 2.205(f). It

constitutes final agency action with respect to that claim, and is subject to judicial review under Chapter 7 of Title 5, United States Code. Subject to the provisions of 40 C.F.R. § 2.210, EPA will make the information available to the public on the tenth working day after receipt by Anaconda Ericsson of this determination, unless the Office of Regional Counsel, U.S. Environmental Protection Agency, Region V, has first been notified of the commencement by Anaconda Ericsson of an action in a federal court to obtain judicial review of the determination and to obtain preliminary injunctive relief against disclosure. If such an action is timely commenced, EPA may nonetheless make the information available to the public, in the absence of an order by the court to the contrary, once the court has denied a motion of preliminary injunction in the action or has otherwise upheld the EPA dtermination, or whenever it appears to the Office of Regional Counsel, after reasonable notice to Anaconda Ericsson that Anaconda Ericsson is not taking appropriate measures to obtain a speedy resolution of the action.

Robert B. Schaefer
Regional Counsel

Chicago, Illinois
June 16, 1982

MAY 10 1982

5HW-TUB

Mr. Mark Valentine
Senion Environmental Engineer
Anaconda-Ericsson Incorporated
Greenwich Office Park 3
Greenwich, Connecticut 06830

RE: IND062803697
Marion, Indiana
ILD062406608
Sycamore, Illinois

Dear Mr. Valentine:

This is to confirm our telephone conversation today in which I requested further substantiation of Anaconda-Ericsson's claims of business confidentiality for information submitted to the U.S. Environmental Protection Agency (USEPA). The information claimed confidential consists of certain items on Part A, Form 3, of the Resource Conservation and Recovery Act permit applications for the above captioned facilities.

As I indicated in our conversation, your November 17, 1980 substantiation of the claims made only a brief, conclusory statement that disclosure of the description of hazardous wastes, the facility drawing, and photographs could be harmful to the competitive position of the company by revealing production methods and capacities. This substantiation forms an insufficient basis for a determination that release of any or all of the information claimed confidential would cause substantial harm to Anaconda-Ericsson's competitive position. The burden of proving that information subject to a claim of confidentiality is entitled to confidential treatment is on the party asserting the claim. 40 CFR § 2.208(e)(1).

In order to support your claim, additional information is required. For exapple, you must explain for each item claimed confidential how release of this information would harm Anaconda-Ericsson's competitive position. This explanation should be detailed rather than the assertion of a general conclusion. If you assert that knowledge of a particular item would reveal a production method, you should explain exactly what that production method is, why it is not general knowledge, and why release of the information would harm your competitive position. Also, you stated that the information is not normally disclosed to others. Please explain what your procedures are for safeguarding the information. 40 CFR 2.208(b). You asked that the information be held as confidential for 20 years. Please explain why you believe the information should be held confidential for this period of time.

For additional guidance, I suggest that you familiarize yourself with the provisions in 40 CFR Part 2 concerning business confidentiality. Please note that you may assert a business confidentiality claim covering all or part of any additional comments you submit to substantiate you claim. Those comments that have been indicated as confidential will be regarded by USEPA as entitled to confidential treatment and will not be disclosed by USEPA without the consent of Anaconda-Ericsson unless ordered by a Federal court.

I would like to receive your additional substantiation by June 1, 1982. If you need additional time to develop substantiation, please contact me. If you no longer wish to assert a claim of confidentiality on all or part of the originally claimed items, please send me a letter withdrawing your claim. A determination based on your November 17, 1980 substantiation will be made if I do not heat from yourby June 1, 1982. If you have any questions, do not hesitate to call me at (312) 886-7457.

Sincerely,

Mary A. Gade
Assistion REgional Counsel

5HW-TUB:MARY A. GADE:Pam Grace:5-10-82

	Typist	Author	Other Staff	RAIU Chief	SPIS Secy.	SPIS Chief	WMB Chief	WMD Director
Initials	PG							
Date	5/10							

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION V
111 West Jackson Blvd.
CHICAGO, ILLINOIS 60604

OCT 27 1982

REPLY TO ATTENTION OF:
RCRA ACTIVITIES

Mark Valentine, Sr. Env. Eng.
Anaconda - Ericsson Inc
Greenwich Office Park 3
Greenwich, Connecticut 06830

RE: Interim Status Acknowledgement USEPA ID No. IL D062406608
FACILITY NAME: Anaconda - Ericsson, Inc.

Dear Mr. Valentine:

This is to acknowledge that the U.S. Environmental Protection Agency (USEPA) has completed processing your Part A Hazardous Waste Permit Application. It is the opinion of this office that the information submitted is complete and that you, as an owner or operator of a hazardous waste management facility, have met the requirements of Section 3005(e) of the Resource Conservation and Recovery Act (RCRA) for interim status. However, should USEPA obtain information which indicates that your application was incomplete or inaccurate, you may be requested to provide further documentation of your claim for interim status. Our opinion will be reevaluated on the basis of this information.

The State of Illinois has received Phase I interim authorization under Section 3006 of RCRA. Because of this authorization you are required to comply with standards prescribed in 35 Illinois Administrative Code, Subtitle G, Chapter I, Subchapter c, Part 725, in lieu of the standards in 40 CFR 265. In addition, you are reminded that operating under interim status does not relieve you of the need to comply with other applicable Federal, State and local requirements.

The printout enclosed with this letter identifies the limit(s) of the process design capacities your facility may use during the interim status period. This information was obtained from the Part A permit application that was sent to USEPA. If you wish to handle new wastes, to change processes, to increase the design capacity of existing processes, or to change ownership or operational control of the facility, you may do so only as provided in 40 CFR 122.23 and as State regulations allow.

As stated in the first paragraph of this letter, you have met the requirements of 40 CFR 122.23; your facility may operate under interim status until such time as an RCRA permit is issued or denied. This will be preceded by a request from this office or the Illinois Environmental Protection Agency for Part B of your application. Please contact Arthur Kawatachi of my staff at (312) 886-7449, if you have any questions concerning this letter or the enclosure.

If you have questions concerning the Illinois hazardous waste regulations, please contact Mr. Robert Kuykendall at the Illinois EPA, 2200 Churchill Road, Springfield, Illinois 62706. His phone number is (217) 782-6760.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief
Waste Management Branch

Enclosure

cc: Walter J. Plate, Vice President

FACILITY NAME

ANACONDA - ERICSSON INC

EPA ID NUMBER

ILD062406608

FACILITY OPERATOR

ANACONDA - ERICSSON INC

FACILITY OWNER

ANACONDA - ERICSSON INC

FACILITY LOCATION

421 N. CALIFORNIA ST
SYCAMORE IL 60187

PROCESS CODE	DESIGN CAPACITY	UNIT OF MEASURE
S01	18750	G

--- KEY ---

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE
STORAGE:		
CONTAINER	S01	G or L
TANK	S02	G or L
WASTE PILE	S03	Y or C
SURFACE IMPOUNDMENT	S04	G or L
DISPOSAL:		
INJECTION WELL	D79	G,L,U, or V
LANDFILL	D80	A or F
LAND APPLICATION	D81	B or Q
OCEAN DISPOSAL	D82	U or V
SURFACE IMPOUNDMENT	D83	G or L
TREATMENT:		
TANK	T01	U or V
SURFACE IMPOUNDMENT	T02	U or V
INCINERATOR	T03	D,W,E, or H
OTHER	T04	U,V,J,R,N, or S

UNIT OF MEASURE	CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS/HOUR	W
GALLONS/HOUR	E
LITERS/HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q
POUNDS/HOUR	J
KILOGRAMS/HOUR	R
TONS PER DAY	N
METRIC TONS/DAY	S

EPA

ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act *(RCRA)*. Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER ➤ ILD062406608 REACKNOWLEDGEMENT

ANACONDA ERICSSON INC
421 N CALIFORNIA ST
SYCAMORE IL 60178

INSTALLATION ADDRESS ➤

421 NORTH CALIFORNIA STREET
SYCAMORE IL 60178

EPA Form 8700-12B (4-80)

09/28/81

Please print or type with ELITE type *(12 characters/inch)* in the unshaded areas only.

Form Approved OMB No. 158-S790[illegible]
OSA No. 0246-EPA-OT

EPA

U.S. ENVI[illegible]ENTAL PROTECTION AGENCY

NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTRUCTIONS: If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law *(Section 3010 of the Resource Conservation and Recovery Act).*

INSTALLATION'S EPA I.D. NO. — ILD 06 2406608

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE 000044 AUG 18 80

OUT OF BUSINESS CLOSED FACILITY

DETACH

FOR OFFICIAL USE ONLY

COMMENTS: C

INSTALLATION'S EPA I.D. NUMBER: F ILD062406608 T/A 1 C — APPROVED: A — DATE RECEIVED (yr., mo., & day): 800818

I. NAME OF INSTALLATION

ANACONDA-ERICSSON, INC.

II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX: 3421 NORTH CALIFORNIA STREET

CITY OR TOWN: 4 SYCAMORE — ST.: IL — ZIP CODE: 60178

III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER: 5 4421 NORTH CALIFORNIA STREET

CITY OR TOWN: 6 SYCAMORE — ST.: IL — ZIP CODE: 60178

IV. INSTALLATION CONTACT

NAME AND TITLE *(last, first, & job title)*: 2 VALENTINE, MARK SR. ENV. ENG.

PHONE NO. *(area code & no.)*: 203-622-7234

V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER: 8 ANACONDA-ERICSSON, INC.

B. TYPE OF OWNERSHIP *(enter the appropriate letter into box)*: [ ]

F = FEDERAL
M = NON-FEDERAL

VI. TYPE OF HAZARDOUS WASTE ACTIVITY *(enter "X" in the appropriate box(es))*

- [X] A. GENERATION
- [ ] B. TRANSPORTATION *(complete item VII)*
- [X] C. TREAT/STORE/DISPOSE
- [ ] D. UNDERGROUND INJECTION

VII. MODE OF TRANSPORTATION *(transporters only – enter "X" in the appropriate box(es))*

- [ ] A. AIR
- [ ] B. RAIL
- [ ] C. HIGHWAY
- [ ] D. WATER
- [ ] E. OTHER *(specify)*:

VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below.

- [X] A. FIRST NOTIFICATION
- [ ] B. SUBSEQUENT NOTIFICATION *(complete item C)*

C. INSTALLATION'S EPA I.D. NO.: ILD062406608

IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

AUG 18 1980

CONTINUE ON REVERSE

I.D. – FOR OFFICIAL USE ONLY

S													T/A	C
W	I	L	D	0	6	2	4	0	6	6	0	8	2	1
1	2											13	14	15

IX. DESCRIPTION OF HAZARDOUS WASTES *(continued from front)*

A. HAZARDOUS WASTES FROM NON–SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.31 for each listed hazardous waste from non–specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
F002	F004	F017	F003		
7	**8**	**9**	**10**	**11**	**12**

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four–digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
19	**20**	**21**	**22**	**23**	**24**
25	**26**	**27**	**28**	**29**	**30**

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four–digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
37	**38**	**39**	**40**	**41**	**42**
43	**44**	**45**	**46**	**47**	**48**

D. LISTED INFECTIOUS WASTES. Enter the four–digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54

E. CHARACTERISTICS OF NON–LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non–listed hazardous wastes your installation handles. *(See 40 CFR Parts 261.21 – 261.24.)*

[X] 1. IGNITABLE (D001)	[X] 2. CORROSIVE (D002)	[ ] 3. REACTIVE (D003)	[ ] 4. TOXIC (D000)

X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE	NAME & OFFICIAL TITLE *(type or print)*	DATE SIGNED
Daniel B. Johnson	Daniel B. Johnson Plant Manager	8-14-80

CHANGE TO "-LOSED FACILITY"
4-23-84

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: 03705003-DeKalb County
Sycamore/Anaconda Ericsson
Closure Plan Approved: July 8, 1983
ILD062406608 G1TSD1PA

April 19, 1984

RECEIVED
APR 24 1984
WMD-RAIU
EPA, REGION V

Mark Valentine
Manager of Environmental Affairs
Anaconda Wire & Cable Company
Greenwich Office Park 3
P.O. Box 3110
Greenwich, CT 06836

Dear Mr. Valentine:

The subject hazardous waste storage facility was inspected by a representative of this Agency on April 9, 1984. The inspection revealed that the site was closed in accordance with the approved closure plan dated February 16, 1983 (addended May 27, 1983).

By this letter, this Agency acknowledges that certification that the above-referenced site had been closed in accordance with the approved closure plan by the owner/operator, Anaconda Wire & Cable Company, and an independent registered professional engineer of Illinois, Quentin Davis, Fehr-Graham & Associates, was received at this Agency November 21, 1983.

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:PMM/maw/0823d/11

cc: Rockford Region
Quentin Davis, P.E.
Division File
Financial Assurance Unit
Robert Stone, Illinois S.I.O., USEPA Region V
Chuck Lewis, USEPA Region V
Bill Radlinski

RECEIVED
APR 23 1984
WASTE MANAGEMENT
BRANCH

TO PART A FILE.

Illinois Environmental Protection Agency · 2200 Churchill Road, Springfield, IL 62706

217/782-6762

Refer to: DeKalb County General
Sycamore/Anaconda-Ericsson, Inc.
ILD062406608

ILD 062406608

July 8, 1983

Mark Valentine, Manager, Environmental Affairs
Anaconda-Ericsson, Inc.
Greenwich Office Park 3
Post Office Box 13110
Greenwich, Connecticut 06836

Dear Mr. Valentine:

The closure plans submitted by Anaconda-Ericsson, Inc., and prepared by Anaconda-Ericsson, Inc., dated February 16, 1983 and the addendum to the closure plan dated May 27, 1983, and received by this Agency on February 23, 1983 and May 31, 1983, respectively, to close the hazardous waste storage area is hereby approved. The approval of these plans is further subject to the following modifications and conditions:

1. Certification of Closure: When closure is complete the owner or operator must submit to the Director certification both by the owner or operator and by an independent registered professional engineer that the facility has been closed in accordance with the specifications in the approved closure plan.

2. The certifications as described above must be submitted to this Agency within 90 days of removal of remaining wastes or within 180 days of the date of this letter, whichever is earlier.

All certifications, logs, or reports which are required to be submitted to the Agency by the facility should be mailed to the following address:

Illinois Environmental Protection Agency
Division of Land Pollution Control
Permit Section
2200 Churchill Road
Springfield, Illinois 62706

Very truly yours,

Lawrence W. Eastep, P.E., Manager
Permit Section
Division of Land Pollution Control

LWE:PMM:bls/7580C,16

cc: Rockford Region
USEPA -- Region V

RECEIVED
JUL 13 1983
WASTE MANAGEMENT BRANCH

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

0003 12/19/80

Form Approved OMB No. 158-R0175

FORM 1 GENERAL

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY

GENERAL INFORMATION

Consolidated Permits Program

(Read the "General Instructions" before starting.)

I. EPA I.D. NUMBER

F | ILD062406608 | 3 | D

LABEL ITEMS

- I. EPA I.D. NUMBER
- III. FACILITY NAME
- V. FACILITY MAILING ADDRESS
- VI. FACILITY LOCATION

PLEASE PLACE LABEL IN THIS SPACE

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill—in area below. Also, if any of the preprinted data is absent *(the area to the left of the label space lists the information that should appear)*, please provide it in the proper fill—in area*(s)* below. If the label is complete and correct, you need not complete Items I, III, V, and VI *(except VI-B which must be completed regardless)*. Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of **bold—faced terms.**

SPECIFIC QUESTIONS	MARK 'X' YES	NO	FORM ATTACHED
A. Is this facility a **publicly owned treatment works** which results in a **discharge** to **waters of the U.S.**? (FORM 2A)		X	
B. Does or will this facility *(either existing or proposed)* include a **concentrated animal feeding operation** or **aquatic animal production facility** which results in a **discharge** to **waters of the U.S.**? (FORM 2B)		X	
C. Is this a facility which currently results in **discharges** to **waters of the U.S.** other than those described in A or B above? (FORM 2C)	X		NA
D. Is this a proposed facility *(other than those described in A or B above)* which will result in a **discharge** to **waters of the U.S.**? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of **hazardous wastes**? (FORM 3)	X		X
F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	
H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	
I. Is this facility a proposed **stationary source** which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	
J. Is this facility a proposed **stationary source** which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an **attainment area**? (FORM 5)		X	

III. NAME OF FACILITY

1 SKIP: ANACONDA-ERICSSON, INC.

IV. FACILITY CONTACT

A. NAME & TITLE *(last, first, & title)*	B. PHONE *(area code & no.)*
2 VALENTINE MARK SR. ENV. ENG.	203 / 622 / 7234

V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX

3 GREENWICH OFFICE PARK 3

B. CITY OR TOWN	C. STATE	D. ZIP CODE
4 GREENWICH	CT	06830

VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER

5 421 NORTH CALIFORNIA STREET

B. COUNTY NAME

DEKALB

C. CITY OR TOWN	D. STATE	E. ZIP CODE	F. COUNTY CODE *(if known)*
6 SYCAMORE	IL	60187	037

CONTINUE ON REVERSE

CONTINUED FROM THE FRONT

VII. SIC CODES (4-digit, in order of priority)

A. FIRST	B. SECOND
3357 (specify) nonferrous wire-drawing & insulating	3351 (specify)

C. THIRD	D. FOURTH
(specify)	(specify)

VIII. OPERATOR INFORMATION

A. NAME: ANACONDA-ERICSSON INC.

B. Is the name listed in Item VIII-A also the owner? XX YES ☐ NO

C. STATUS OF OPERATOR (Enter the appropriate letter into the answer box; if "Other", specify.)
F = FEDERAL, S = STATE, P = PRIVATE, M = PUBLIC (other than federal or state), O = OTHER (specify)
P (specify) NA

D. PHONE (area code & no.): 203 622 7234

E. STREET OR P.O. BOX: GREENWICH OFFICE PARK 3

F. CITY OR TOWN: GREENWICH | G. STATE: CT | H. ZIP CODE: 06830

IX. INDIAN LAND

Is the facility located on Indian lands? ☐ YES XX NO

X. EXISTING ENVIRONMENTAL PERMITS

A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions from Proposed Sources)
9 N I L0000376 0	9 P

B. UIC (Underground Injection of Fluids)	E. OTHER (specify)
9 U	9 (specify)

C. RCRA (Hazardous Wastes)	E. OTHER (specify)
9 R	9 (specify)

XI. MAP

Attach to this application a topographic map of the area extending to at least one mile beyond property bounderies. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements. F9: A/50

XII. NATURE OF BUSINESS (provide a brief description)

The facility is engaged in the manufacture of copper and aluminum wire and cable.

F9: A/51

XIII. CERTIFICATION (see instructions)

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATURE	C. DATE SIGNED
Walter J. Plate, Vice President	Walter J. Plate	11/16/80

COMMENTS FOR OFFICIAL USE ONLY

C

Please print or type in the unshaded areas only
(fill—in areas are spaced for elite type, i.e., 12 characters/inch).

Form Approved OMB No. 158-S80004

FORM 3 RCRA

U.S. ENVIRONMENTAL PROTECTION AGENCY

HAZARDOUS WASTE PERMIT APPLICATION

Consolidated Permits Program

(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER

S: F | 1 L D 0 6 2 4 0 6 6 0 8 | T/A: 3 | C: 1

FOR OFFICIAL USE ONLY

APPLICATION APPROVED	DATE RECEIVED (yr., mo., & day)	COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below *(mark one box only)* to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION *(place an "X" below and provide the appropriate date)*

[X] 1. EXISTING FACILITY *(See instructions for definition of "existing" facility. Complete item below.)*

FOR EXISTING FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED *(use the boxes to the left)*

C: 8 | YR.: 8 0 | MO.: 1 0 | DAY: 3 0

[ ] 2. NEW FACILITY *(Complete item below.)*

FOR NEW FACILITIES, PROVIDE THE DATE *(yr., mo., & day)* OPERATION BEGAN OR IS EXPECTED TO BEGIN

YR. | MO. | DAY

B. REVISED APPLICATION *(place an "X" below and complete Item I above)*

[ ] 1. FACILITY HAS INTERIM STATUS

[ ] 2. FACILITY HAS A RCRA PERMIT

III. PROCESSES – CODES AND DESIGN CAPACITIES

A. PROCESS CODE – Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code*(s)* in the space provided. If a process will be used that is not included in the list of codes below, then describe the process *(including its design capacity)* in the space provided on the form *(Item III-C).*

B. PROCESS DESIGN CAPACITY – For each code entered in column A enter the capacity of the process.

1. AMOUNT – Enter the amount.
2. UNIT OF MEASURE – For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:		
CONTAINER *(barrel, drum, etc.)*	S01	GALLONS OR LITERS
TANK	S02	GALLONS OR LITERS
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS
Disposal:		
INJECTION WELL	D79	GALLONS OR LITERS
LANDFILL	D80	ACRE-FEET *(the volume that would cover one acre to a depth of one foot)* OR HECTARE-METER
LAND APPLICATION	D81	ACRES OR HECTARES
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS

PROCESS	PROCESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Treatment:		
TANK	T01	GALLONS PER DAY OR LITERS PER DAY
SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
OTHER *(Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)*	T04	GALLONS PER DAY OR LITERS PER DAY

UNIT OF MEASURE	UNIT OF MEASURE CODE
GALLONS	G
LITERS	L
CUBIC YARDS	Y
CUBIC METERS	C
GALLONS PER DAY	U
LITERS PER DAY	V
TONS PER HOUR	D
METRIC TONS PER HOUR	W
GALLONS PER HOUR	E
LITERS PER HOUR	H
ACRE-FEET	A
HECTARE-METER	F
ACRES	B
HECTARES	Q

EXAMPLE FOR COMPLETING ITEM III *(shown in line numbers X-1 and X-2 below):* A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

S: C | DUP | T/A: 3 | C: 1

LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT (specify)	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PROCESS CODE (from list above)	B. PROCESS DESIGN CAPACITY 1. AMOUNT	B. PROCESS DESIGN CAPACITY 2. UNIT OF MEASURE (enter code)	FOR OFFICIAL USE ONLY
X-1	S 0 2	600	G		5				
X-2	T 0 3	20	E		6				
1	S 0 1	18,750 000	G		7				
2	T 0 1	500 000	G		8				
3					9				
4					10				

Continued from the front.

III. PROCESSES *(continued)*

C. SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES *(code "T04")*. **FOR EACH PROCESS ENTERED HERE INCLUDE DESIGN CAPACITY.**

IV. DESCRIPTION OF HAZARDOUS WASTES

A. EPA HAZARDOUS WASTE NUMBER – Enter the four–digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four–digit number*(s)* from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

B. ESTIMATED ANNUAL QUANTITY – For each **listed waste** entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each **characteristic** or **toxic contaminant** entered in column A estimate the total annual quantity of all the non–listed waste*(s)* that will be handled which possess that characteristic or contaminant.

C. UNIT OF MEASURE – For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE	METRIC UNIT OF MEASURE	CODE
POUNDS	P	KILOGRAMS	K
TONS	T	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:
   For listed hazardous waste: For each **listed** hazardous waste entered in column A select the code*(s)* from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.
   For non–listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code*(s)* from the list of process codes contained in Item III to indicate **all** the processes that will be used to store, treat, and/or dispose of all the non–listed hazardous wastes that possess that characteristic or toxic contaminant.
   Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code*(s)*.

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER – Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV *(shown in line numbers X-1, X-2, X-3, and X-4 below)* – A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non–listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

Continued from page 2.

NOTE: Photocopy this page before completing if you have more than 26 wastes to list.

Form Approved OMB No. 158-S80004

EPA I.D. NUMBER (enter from page 1)															FOR OFFICIAL USE ONLY													
S W	1	L	D	Ø	6	2	4	Ø	6	6	Ø	8	T/A 3	C 1	S W	DUP										T/A 3	C 2	DUP
1 2												13	14	15	1 2									13	14	15	23 - 26	

V. DESCRIPTION OF HAZARDOUS WASTES (continued)

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEASURE (enter code)	D. PROCESSES 1. PROCESS CODES (enter)	D. PROCESSES 2. PROCESS DESCRIPTION (if a code is not entered in D(1))
	23 - 26	27 - 35	36	27 - 29 / 27 - 29 / 27 - 29 / 27 - 29	
1	F Ø Ø 2	1200ØØØ	P	S Ø 1	
2	F Ø Ø 3	3200ØØØ	P	S Ø 1	
3	F Ø Ø 4	5ØØØØØØ	P	S Ø 1	
4	F Ø 1 7	15ØØØØØ	P	S Ø 1	
5	D Ø Ø 1	15000ØØØ	P	S Ø 1	
6	D Ø Ø 2	8ØØØØØØ	P	S Ø 1 T Ø 1	
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					

Confidentiality claim denied by Office of Regional Counsel 7-27-82 6-16-82

Continued from the front.

IV. DESCRIPTION OF HAZARDOUS WASTE (continued)

E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE 3.

EPA I.D. NO. (enter from page 1)

S												T/A	C
F	I	L	D	0	6	2	4	0	6	6	0	83	6
1	2										13	14	15

V. FACILITY DRAWING

All **existing** facilities must include in the space provided on page 5 a scale drawing of the facility *(see instructions for more detail).* F6: A/55

VI. PHOTOGRAPHS

All existing facilities must include photographs *(aerial or ground–level)* that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas *(see instructions for more detail).* F6: A/56

VII. FACILITY GEOGRAPHIC LOCATION

LATITUDE (degrees, minutes, & seconds)									LONGITUDE (degrees, minutes, & seconds)								
4	1	5	9	4	4	0	N		0	8	8	4	1	2	4	0	W
65	66	67	68	69	-	71			72	-	74	75	76	77	-	79	

VIII. FACILITY OWNER

XX A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER	2. PHONE NO. (area code & no.)
C E	
15 16 - 55	56 - 58 / 59 - 61 / 62 - 65

3. STREET OR P.O. BOX	4. CITY OR TOWN	5. ST.	6. ZIP CODE
C F	C G		
15 16 - 45	15 16 - 40	41 42	47 - 51

IX. OWNER CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED
Walter J. Plate, Vice President	Walter J. Plate	11/16/80

X. OPERATOR CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

A. NAME (print or type)	B. SIGNATURE	C. DATE SIGNED

FORM 3
ITEM VI.

CONFIDENTIAL

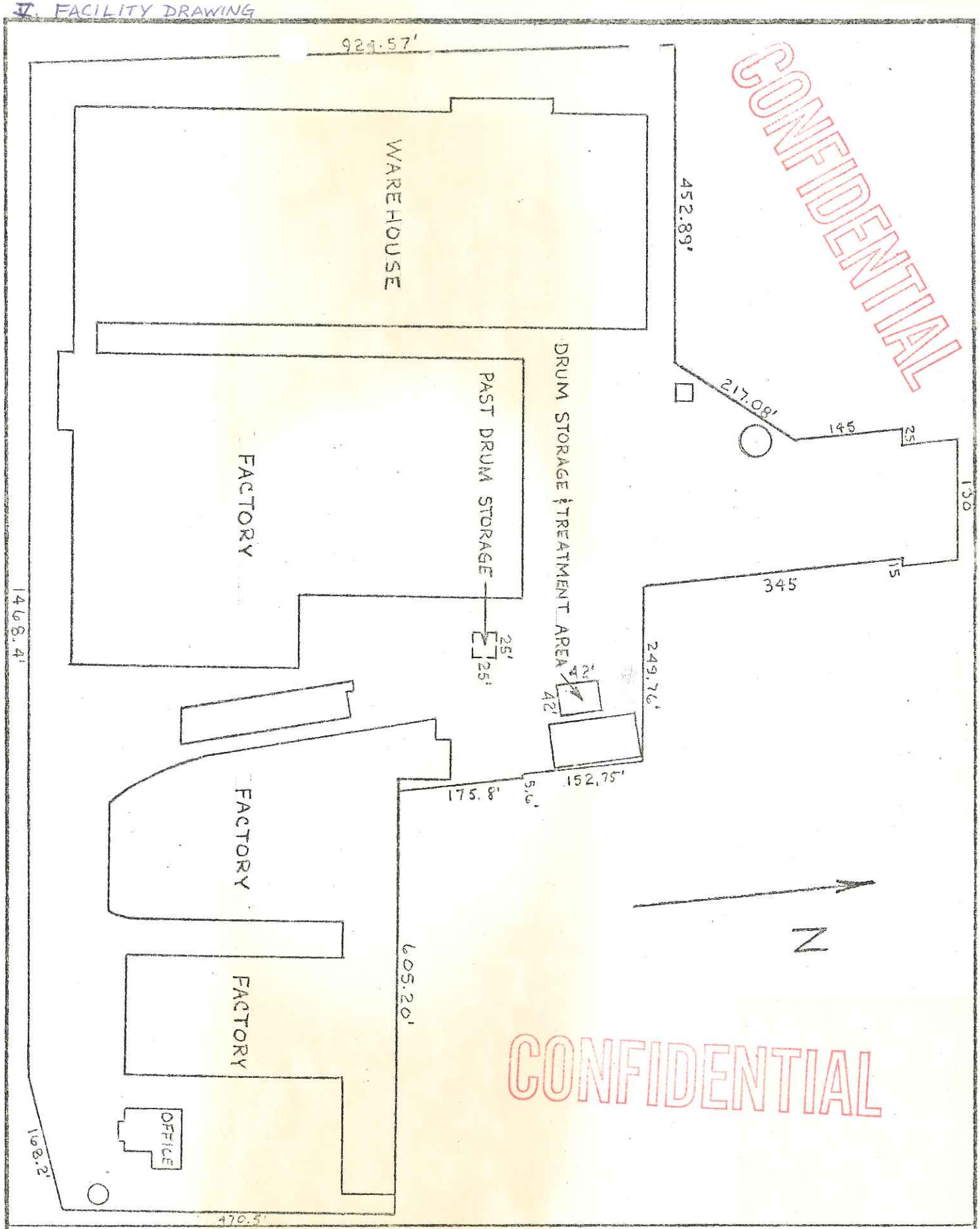
CONFIDENTIAL

Confidentiality claim denied by Office of Regional Counsel _____

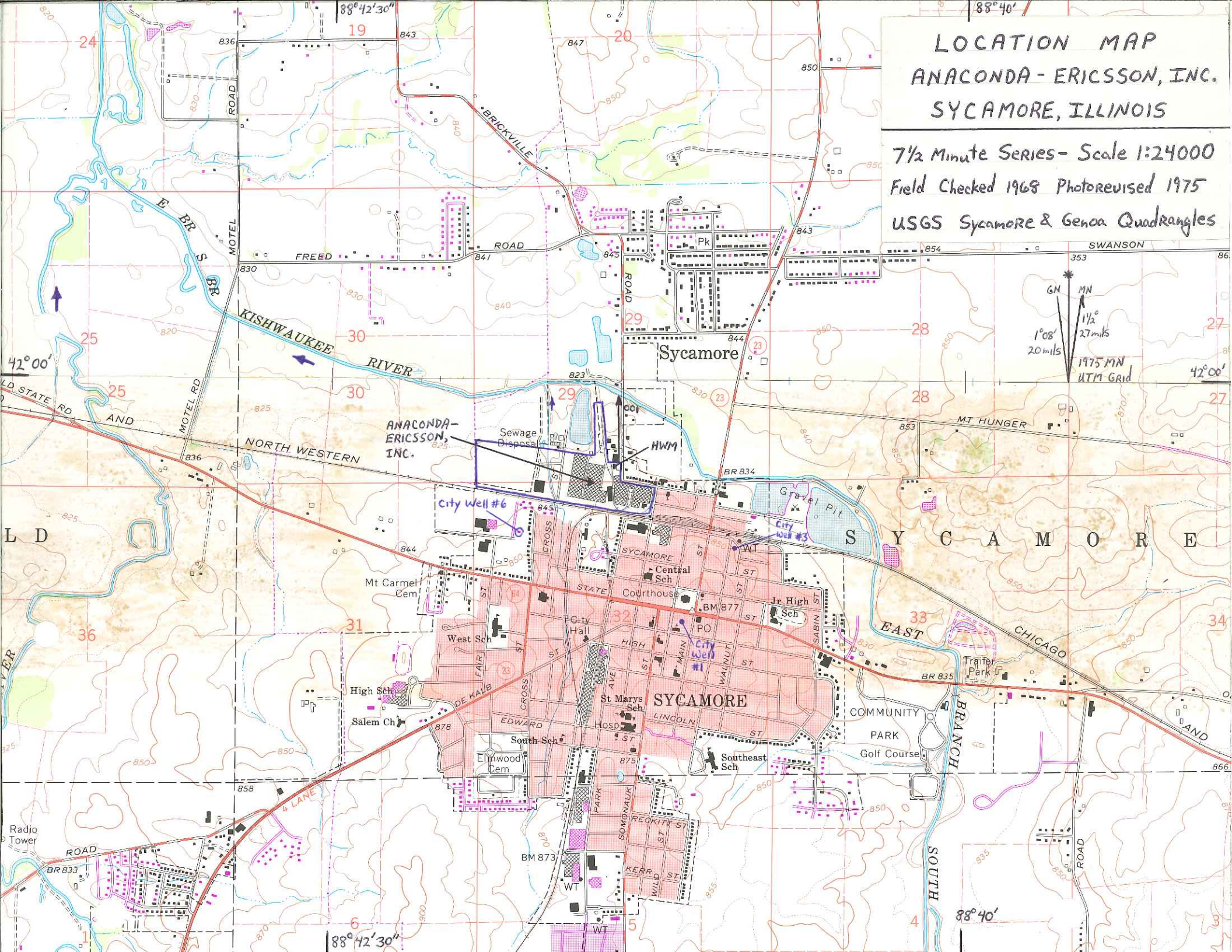
Confidentiality claim denied by Office of Regional Counsel _____

Anaconda-Ericsson, Inc.
Sycamore, IL.
Photograph

V. FACILITY DRAWING



SCALE 1"=180'	FACILITY DRAWING	PLANT ENGINEERING DEPARTMENT ANACONDA SYCAMORE ILLINOIS
DWN. RDC DATE 10/29/80	ANACONDA-ERICSSON INC	NO.
CHK. TRL APPD.	SYCAMORE IIINOIS	


LOCATION MAP
ANACONDA - ERICSSON, INC.
SYCAMORE, ILLINOIS
7½ Minute Series - Scale 1:24000
Field Checked 1968 Photorevised 1975
USGS Sycamore & Genoa Quadrangles
88°42'30"
88°40'
42°00'
GN
MN
1°08'
20 mils
1½°
27 mils
1975 MN
UTM Grid
ANACONDA-
ERICSSON,
INC.
Sewage
Disposal
HWM
City Well #6
City Well #3
City Well #1
Gravel Pit
Sycamore
SYCAMORE
Central Sch
Courthouse
BM 877
City Hall
PO
West Sch
Jr High Sch
High Sch
Salem Ch
St Marys Sch
Hosp
South Sch
Elmwood Cem
Mt Carmel Cem
Southeast Sch
Trailer Park
COMMUNITY
PARK
Golf Course
BM 873
Radio Tower
BRICKVILLE ROAD
FREED ROAD
MOTEL ROAD
E BR S BR KISHWAUKEE RIVER
STATE AND NORTH WESTERN
MT HUNGER
SWANSON
EAST CHICAGO
BRANCH
SOUTH
4 LANE
BR 834
BR 835
BR 833
CROSS ST
SYCAMORE ST
STATE ST
HIGH ST
MAIN ST
WALNUT ST
SABIN ST
FAIR AVE
DE KALB ST
EDWARD ST
LINCOLN ST
PARK ST
SOMONAUK ST
RECKITT ST
KERR ST
WILD ST
WT

Anaconda Ericsson

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

November 17, 1980

U.S. Environmental Protection Agency - Region V
RCRA Activities
P.O. Box 7861
Chicago, IL 60680

Re: RCRA Permit Application
Anaconda-Ericsson Inc.
Sycamore, IL

Dear Sir:

Enclosed are completed RCRA Permit Application Forms 1 and 3 for our Sycamore, Illinois, facility. Please note that the EPA I.D. number is not included in the permit application. We submitted our notification dated August 14, 1980, to you as required. As of this mailing, we have not received an EPA I.D. number from you. We were instructed by your office to submit our application without the I.D. number since it has not been issued to us.

We are requesting that certain information on the RCRA Permit Application Form 3 be held as confidential. Substantiation of our confidentiality claim is provided in the following as required by the Form 3 instructions regarding Confidential Information.

A. Please hold the following items on Form 3 as confidential:

1. Item IV - Description of Hazardous Wastes
2. Item V - Facility Drawings
3. Item VI - Photographs

B. Confidential treatment is requested for 10 years.

C. This information is not normally disclosed to others.

D. This information has not been disclosed to others in the past.

E. No Federal agency has made a confidentiality determination regarding this information.

F. Disclosure of this information may be harmful to the competitive position of this company. Disclosure could result in an indication of our production methods and capacities to our competitors; we view this possibility as a substantial harmful effect.

...///...

Please contact myself or Mr. Herb Anderson, at 203-622-7234, if you have any questions.

Sincerely,

Mark Valentine

Mark Valentine
Senior Environmental Engineer

MV:jss
Enclosure
cc: H.S. Anderson - Greenwich
D. Johnson - Sycamore

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HS-JCK-13

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

U.S. EPA ID #: ILD062406608

ANACONDA-ERICSSON INC
421 N CALIFORNIA
SYCAMORE IL 60178

RE: Hazardous Waste Permit Application

Dear Permit Applicant:

As you know, you have previously submitted Part A of the Resource Conservation and Recovery Act (RCRA) permit application for the above-referenced facility. Timely submission of "the Part A" has allowed most hazardous waste management facilities to continue to operate under RCRA "interim status"(or the State program equivalent), while complying with applicable technical and record-keeping standards.

On November 8, 1984, the Hazardous and Solid Waste Amendments of 1984 (the 1984 Amendments) were enacted to modify RCRA. Under the 1984 Amendments, all RCRA permits issued after the date of enactment must provide for corrective action for all releases of hazardous waste or hazardous waste constituents from any solid waste management unit, regardless of the time at which waste was placed in the unit. In addition, all interim status facilities are subject to corrective action requirements, regardless of whether they have 1) submitted a Part B application, 2) submitted a closure plan, 3) reverted to generator status only, 4) actually closed, or 5) none of these. Unless our Agency has formally terminated the facility's interim status, the corrective action requirements apply. Please note that both hazardous and non-hazardous waste can meet the definition of solid waste under 40 CFR 261.2 (or the State regulation equivalent).

We must determine whether releases of hazardous waste or hazardous waste constituents have ever occurred at the facility site. If they have, we must ensure that corrective actions either have been taken or will be taken to eliminate threats to public health or the environment. An important element in our decision process is the information that you provide on the enclosed certification statement. Please read it carefully and either sign it and return it, or return it unsigned with a cover letter of explanation, within 45 days of the date of this letter. At some point in time, public input will be sought to either confirm or deny information you provide, or information we gather on our own, concerning releases and corrective actions.

Please mail your response to the following:

RCRA Activities
Region V
P. O. Box A3587
Attention: ATKJG
Chicago, Illinois 60690

Sincerely yours,

David A. Stringham
Chief, Solid Waste Branch

Enclosure

D. Corrective Action

Rec'd 11/19/92
Compliance

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

November 5, 1992

Mr. Robert Boey, President
American Bare Conductor, Inc.
421 N. California
Sycamore, IL 60178

Re: Visual Site Inspection
Anaconda-Ericsson, Inc.
Sycamore, Illinois
ILD 062 406 608

Dear Mr. Boey:

As indicated in the letter of introduction sent to you on March 30, 1992, the U.S. Environmental Protection Agency is enclosing a copy of the final Preliminary Assessment/Visual Site Inspection (PA/VSI) report for the referenced facility. The executive summary and conclusions and recommendations sections have been withheld as Enforcement Confidential.

If you have any questions, please call Francene Harris at (312) 886-2884.

Sincerely yours,

Kevin M. Pierard, Chief
Minnesota/Ohio Technical Enforcement Section
RCRA Enforcement Branch

NPX

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

HRE-8J

E-8

Mr. Robert Boey, President
American Bare Conductor, Inc.
421 N. California
Sycamore, IL 60178

Re: Visual Site Inspection
Anaconda-Ericsson, Inc.
ILD 062 406 608

Dear Mr. Boey:

The United States Environmental Protection Agency (U.S. EPA) Region V will conduct a Preliminary Assessment including a Visual Site Inspection (PA/VSI) at the referenced facility. This inspection is conducted pursuant to the Resource Conservation and Recovery Act, as amended (RCRA) Section 3007 and the Comprehensive Environmental Response, Compensation, and Liability Act, as amended (CERCLA) Section 104(e). The referenced facility has generated, treated, stored, or disposed of hazardous waste subject to RCRA. The PA/VSI requires identification and systematic review of all solid waste streams at the facility. The objective of the PA/VSI is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the facility which may require further investigation. This analysis will also provide information to establish priorities for addressing any confirmed releases.

The visual site inspection of your facility is to verify the location of all solid waste management units (SWMUs) and areas of concern (AOCs) to make a cursory determination of their condition by visual observation. The definitions of SWMUs and AOCs are included in Attachment I. The VSI supplements and updates data gathered during a preliminary file review. During this site inspection, no samples will be taken. A sampling visit to ascertain if releases of hazardous waste or constituents have occurred may be required at a later date.

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. The site inspection is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of the facility are necessary to document the condition of the units at the facility and the waste management practices used.

The VSI has been scheduled for April 3, 1992, at 10:00 a.m. The inspection team will consist of Arthur Marshalla and Alan Supple of Resource Applications, Inc., a contractor for the U.S. EPA. Representatives of the Illinois Environmental Protection Agency (IEPA) may also be present. Your cooperation in admitting and assisting them while on site is appreciated.

The U.S. EPA recommends that personnel who are familiar with the present and past manufacturing and waste management activities be available during the VSI. Access to any relevant maps, diagrams, hydrogeologic reports, environmental assessment reports, sampling data sheets, environmental permits (air, NPDES), manifests and/or correspondence is also necessary, as such information is needed to complete the PA/VSI. Attachment II is a summary of the information required.

If you have any questions, please contact me at (312) 886-4448 or Francene Harris at (312) 886-2884. A copy of the Preliminary Assessment/Visual Site Inspection Report, excluding the conclusions and Executive Summary portion will be sent when the report is available.

Sincerely yours,

Francene M. Harris for

Kevin M. Pierard, Chief
OH/MN Technical Enforcement Section

enclosure

cc: Mr. Robert Wengrow, Regional Manager (IEPA)
Mr. Joseph Amerin, (Formerly w/Anaconda-Ericcson, Inc.)
Mr. Chris Sparrer, Risk Manager (Ericsson Radio Systems, Inc.)
Ms. Michelle Boechman, Legal Dept. (Ericsson Network Systems, Inc.)
Mr. Miles Berman, Attorney (Altheimer & Gray)
Mr. Sean Bezark, Attorney (Altheimer & Gray)

ATTACHMENT I

Anaconda-Ericsson, Inc.
421 N. California
Sycamore, IL 60178

The definitions of solid waste management unit (SWMU) and area of concern (AOC) are as follows.

A SWMU is defined as any discernable unit where solid wastes have been placed at any time from which hazardous constituents might migrate, regardless of whether the unit was intended for the management of a solid or hazardous waste.

The SWMU definition includes the following:

- RCRA regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that U.S. Environmental Protection Agency has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents, such as wood preservative treatment dripping areas, loading or unloading areas, or solvent washing areas

An AOC is defined as any area where a release to the environment of hazardous wastes or constituents has occurred or is suspected to have occurred on a nonroutine or nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

ATTACHMENT II

Anaconda-Ericsson, Inc.
421 N. California
Sycamore, IL 60178

PROBABLE SOLID WASTE MANAGEMENT UNITS (SWMUs)

1. Little information was available to compile a list of solid waste management units (SWMUs) at your facility. Please list all waste management units at your facility. If possible, please provide as complete information for the waste unit in response to the questions below.

   From the list of probable SWMUs please address the following questions:

   - Do the above SWMUs still exist at the facility and are they in operation?
   - What are the start-up and closure dates of the above SWMUs?
   - What types of wastes are the SWMUs currently/formerly used for?
   - Name any SWMUs at your facility that have not been listed above. These would include hazardous waste storage areas, treatment units, or any other area or system at your facility dealing with hazardous waste including satellite accumulation areas.
   - What are the average volumes and rates of generation of waste streams?
   - Document any releases that have occurred at the facility. This includes spills or leaks of both wastes and raw product. Outline the action taken to clean up the release.

2. Please supply as much information as possible concerning the site history. This would include any information you have regarding operations and any other owner/operators at this location.

3. Please provide a description of the primary processes taking place at your facility and the waste streams which are generated.

4. Describe the methods of treatment and disposal of generated waste utilized by your facility.

If available, the following items are requested:

- A detailed map of the facility showing the location of the SWMUs and production stations.
- Flow diagrams showing waste streams and waste management practices.
- Copies of any permits currently held by the facility.
- SARA Title III information and a copy of the facility contingency plan.

U.S. Environmental Protection Agency
Office of Waste Programs Enforcement
Contract No. 68-W9-0006

TES 9

Technical Enforcement Support at Hazardous Waste Sites Zone III Regions 5,6, and 7

prc
PRC Environmental Management, Inc.

PRC Environmental Management, Inc.
233 North Michigan Avenue
Suite 1621
Chicago, IL 60601
312-856-8700
Fax 312-938-0118

PRELIMINARY ASSESSMENT/ VISUAL SITE INSPECTION

ANACONDA-ERICSSON, INC.
SYCAMORE, ILLINOIS
ILD 062 406 608

FINAL REPORT

Prepared for

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460

Work Assignment No.	:	R05032
EPA Region	:	5
Site No.	:	ILD 062 406 608
Date Prepared	:	August 12, 1992
Contract No.	:	68-W9-0006
PRC No.	:	209-R05032-IL37
Prepared by	:	Resource Applications, Inc. (Arthur Marshalla)
Contractor Project Manager	:	Shin Ahn
Telephone No.	:	(312) 856-8700
EPA Work Assignment Manager	:	Kevin Pierard
Telephone No.	:	(312) 886-4448

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EXECUTIVE SUMMARY

Resource Applications, Inc. (RAI) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the existence and likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Anaconda-Ericsson, Inc. (A-E, Inc.) facility in Sycamore, Illinois. This summary highlights the results of the PA/VSI and the potential for releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified.

The A-E, Inc. facility manufactured copper and aluminum wire and cable. The facility generated and managed the following waste streams: waste muriatic acid (D002), waste paint (D001), waste mineral spirits (D001), waste varnish (D001), waste chlorinated solvents (F002), waste phosphoric acid (D002), waste laboratory chemicals (waste code not known), waste synthetic oil (nonhazardous) waste polyvinylchloride/polyethylene (waste code not known), and waste wire cut-offs (nonhazardous), waste synthetic oil (nonhazardous). The facility operated at this location from 1890 until 1983. The facility occupies 27.55 acres in an industrial and residential area, and at one time employed as many as 1,000 people. The facility's regulatory status was that of a large-quantity generator and storage facility. Very little information is available about the facility's history and ownership. The facility was in the wire manufacturing business from 1890 to 1983. The area was open land before 1890. The facility was initially called the Chicago Insulated Company. It is not known when the name was changed to Anaconda-Ericsson, Inc. (A-E, Inc.). In February 1983 the A-E, Inc. plant was shut down. A skeleton crew was left to handle the RCRA closure. A certification of closure letter signed by an independent registered professional engineer was submitted to Illinois Environmental Protection Agency (IEPA) on November 16, 1983, and closure was approved by IEPA on April 19, 1984. A-E, Inc. was the operator of the facility. The owner of the facility was Ericsson Radio Systems, Inc., which sold the facility in 1985 to Sycamore Industrial Park Associates, the present owner of the facility. The facility is currently a light industrial park; no hazardous waste activities are taking place on site.

The PA/VSI identified the following two SWMUs and one AOC at the facility:

Solid Waste Management Units

1. Hazardous Waste Storage Building
2. Nonhazardous Waste Storage Area

Area of Concern

1. Underground Storage Tanks

Both SWMUs 1 and 2 have no potential for release to ground water, since the A-E, Inc. facility is inactive and underwent RCRA closure in 1983. There were no documented releases when the facility was operating. AOC 1 has a moderate to high potential for release to ground water, as there are eight underground storage tanks (USTs) which are at least 19 years old, and have no record of being tested.

Both SWMUs 1 and 2 have no potential for release to surface water, since the A-E, Inc. facility is inactive and underwent RCRA closure in 1983. There were no documented releases when the A-E, Inc. facility was operating. AOC 1 has a low potential for release to surface water since the tanks are underground.

Both SWMUs 1 and 2 have no potential for release to air, since the A-E, Inc. facility is inactive and underwent RCRA closure in 1983. There were no documented releases when the facility was operating. AOC 1 has a low potential for release to air, since the tanks are underground and the volatility rate of fuel oil and diesel fuel is low.

Both SWMUs 1 and 2 have no potential for release to on-site soils, since the A-E, Inc. facility is inactive and underwent RCRA closure in 1983. There were no documented releases when the facility was operating. AOC 1 has a moderate to high potential for release to on-site soils, as there are eight underground storage tanks (UST) which are at least 19 years old and have no record of being tested.

Access to the facility was controlled by security guards, although it is not known if they were on duty 24 hours per day. Ground water was used as a drinking and municipal water supply. City

wells are located in the vicinity of the facility to the southwest and east. The nearest well is located 930 feet southwest of the facility. The nearest surface water body, an old gravel pit pond, is located approximately 300 feet north of the facility and is not used for any particular purpose.

RAI recommends that, under proper authority, tank integrity testing or soil sampling be conducted for AOC 1. If any contamination of environmental media is determined, appropriate remedial actions should be taken. RAI recommends no further action for the two SWMUs.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. R05032 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in Region 5. Resource Applications, Inc. (RAI), TES 9 team member, provided the necessary assistance to complete the PA/VSI activities for Anaconda-Ericsson, Inc. (A-E, Inc.).

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, tanks, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, wastewater treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a nonroutine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents and files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all visible SWMUs, identifying evidence of releases, initially identifying potential sampling parameters and locations, if needed, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of a PA/VSI of the Anaconda-Ericsson, Inc. (A-E, Inc.) facility in Sycamore, Illinois. The PA was completed on April 1, 1992. RAI gathered and reviewed information from the Illinois Environmental Protection Agency (IEPA) and from EPA Region 5 RCRA files. RAI also reviewed relevant publications from the U.S. Department of Agriculture (USDA), Illinois State Geological Survey (ISGS), U.S. Geological Survey (USGS), U.S. Department of Commerce (USDC), and the Federal Emergency Management Agency (FEMA). The VSI was conducted on April 3, 1992. It included interviews with facility representatives and a walk-through inspection of the facility. Two SWMUs and one AOC were identified at the facility.

The VSI is summarized and five inspection photographs are included in Attachment A. Field notes from the VSI are included in Attachment B.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

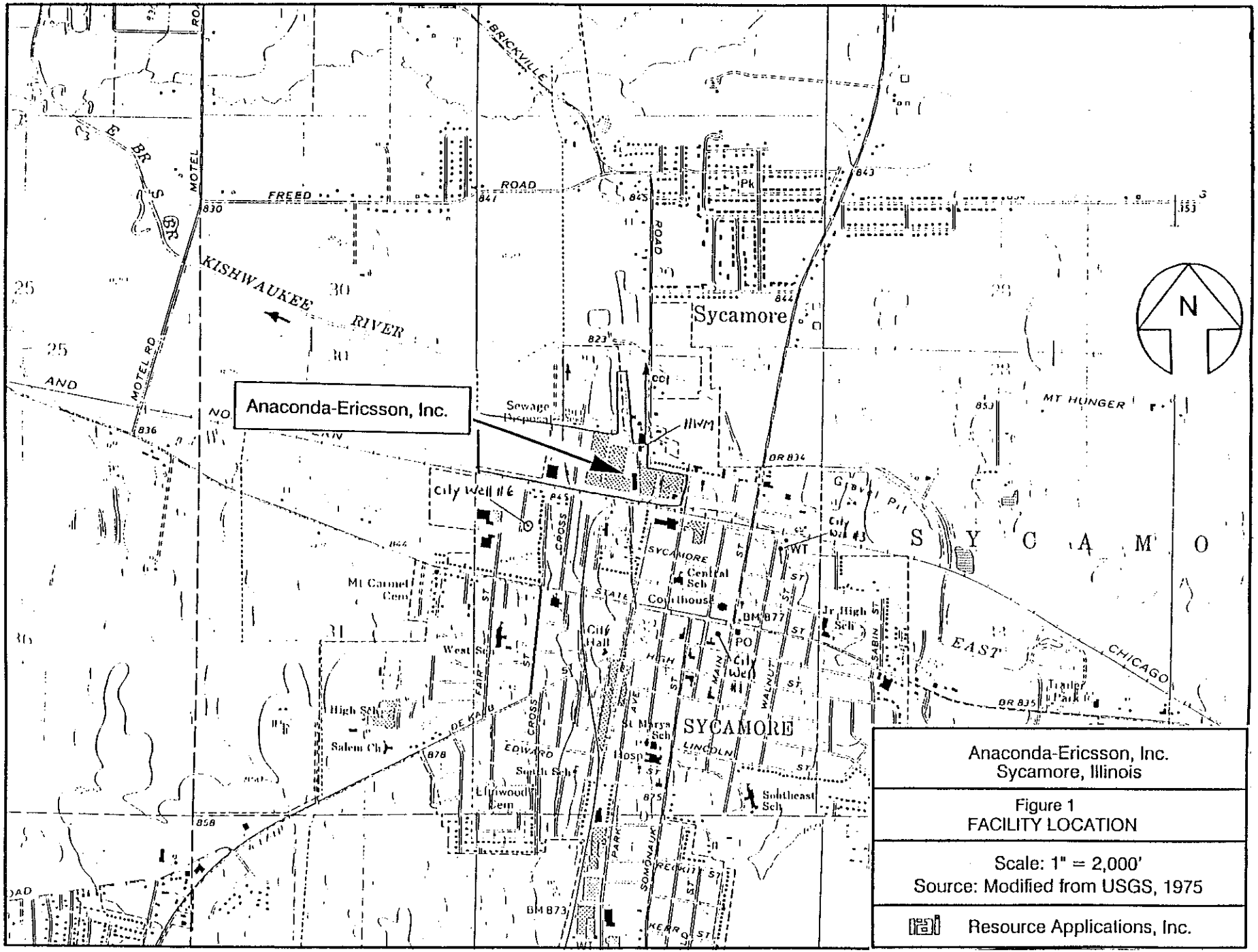
The A-E, Inc. facility is located at 421 North California in Sycamore, DeKalb County, Illinois (latitude 41°59'44" N and longitude 088°41'24" W), as shown in Figure 1. The facility property occupies 27.55 acres in an industrial and residential area.

The facility is bordered on the north by city property, which contains a 7-acre pond (gravel pit filled with water), with one house located between the property and the facility; on the west by a residential area, open land, and Northern Illinois University Engineering School; on the south by a residential area, a handicapped persons training building, and an abandoned railroad line; and on the east by a small residential area, a section of the Kishwaukee River, and light industry.

2.2 FACILITY OPERATIONS

The A-E, Inc. facility manufactured copper and aluminum wire and cable. The process consists of wire drawing (reducing the size or diameter of the wire per specifications) and insulating the wire by an extrusion process. The insulation consisted of polyvinylchloride (PVC) or polyethylene. Some wire was shipped bare and some with a varnish coating. The copper wire process was performed in Building B and was accomplished by drawing (pulling) the wire through various size metal dies. A combination coolant and lubricant solution was used in the drawing operation. It consisted of 60 percent water and 40 percent synthetic oil (with the appearance of "Crisco" or lard). The noncommercial product coolant/lubricant solution was stored in a 3,000-gallon tank adjacent to the drawing operation.

Some of the copper wire went through a tinning operation, which consisted of drawing the wire through a muriatic acid bath for cleaning, through burlap material for a wipe operation, through


Anaconda-Ericsson, Inc.
KISHWAUKEE RIVER
Sycamore
SYCAMORE
EAST
N
Anaconda-Ericsson, Inc.
Sycamore, Illinois
Figure 1
FACILITY LOCATION
Scale: 1" = 2,000'
Source: Modified from USGS, 1975
Resource Applications, Inc.

"Blackstone" flux (inert), and then through the tinning bath. The flux is used to help the tin adhere to the wire. The tinning operation took place in area 8B as indicated on Figure 2. The muriatic acid was delivered to A-E, Inc. in 55-gallon drums.

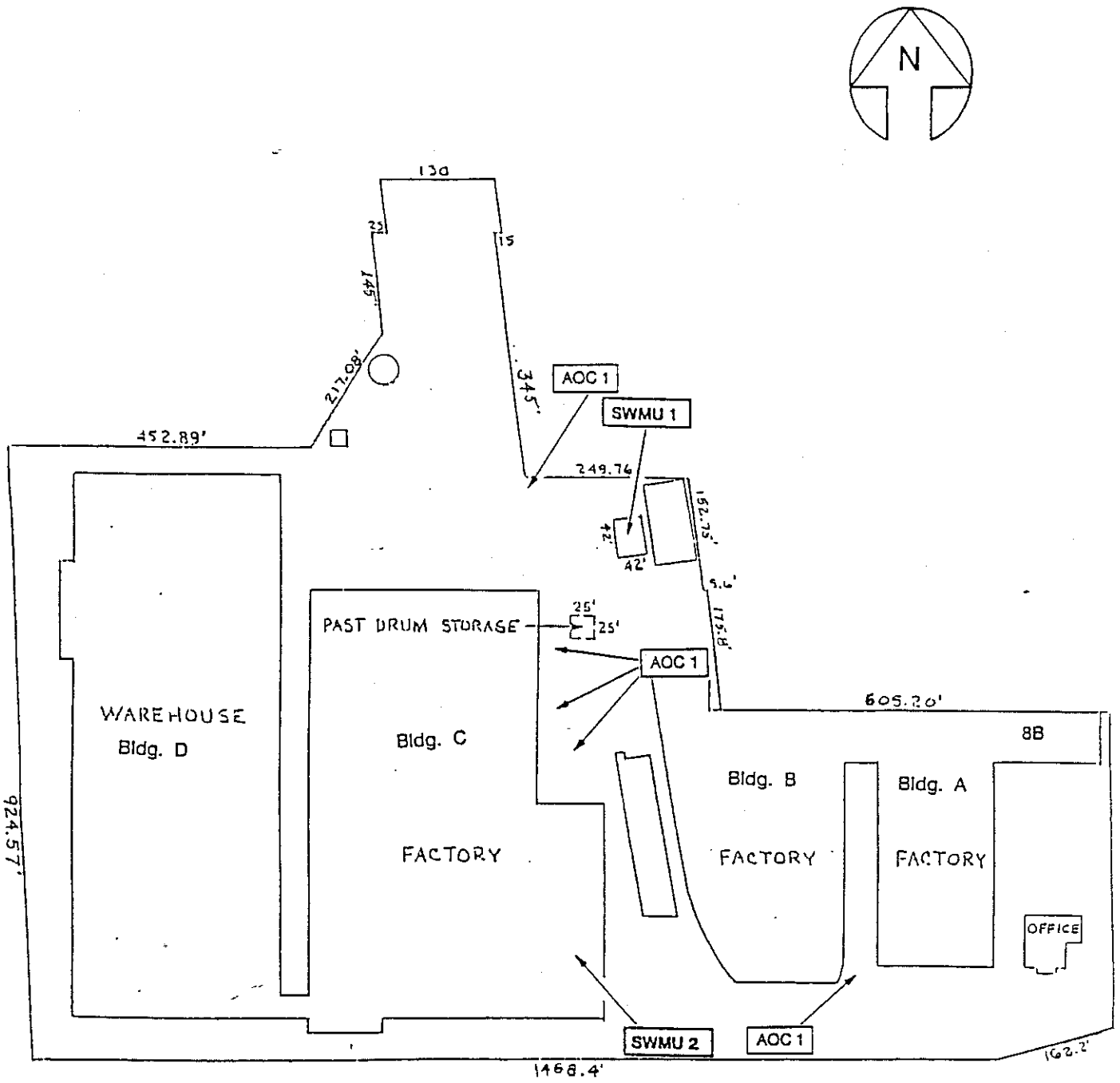
The next step in the operation was the insulation covering which was performed by plastic extrusion. The insulation consisted of PVC (flame retardant) and polyethylene. The PVC and polyethylene were received premixed from Union Carbide. The process consisted of applying heat, melting the plastic, extruding, and cooling.

The aluminum wire process was performed in Building C (west of Building B) and was basically identical to the copper drawing and extrusion-type insulation operation, with some exceptions. The wire drawing operation used petroleum-based oil for the coolant/lubricant.

A-E, Inc. also manufactured magnet wire which was coated with varnish. This wire was used for transformers and alternators. The magnet wire process was performed in Building B from February 1973 to approximately 1979. The magnet wire operation was moved to Carrollton, Kentucky in 1979. The coating operation consisted of drawing the wire through a 2-cubic-foot varnish bath and up through a drying tower where heat was applied by an air-drying operation. This operation would apply about five coats of varnish before completion of the process. After completion of the coating operation, the wire was rewound on a spool and shipped to customers.

There were, and still are, eight Underground Storage Tanks (AOC 1); of which seven are located in the north-central section of the facility, mainly between Buildings B and C. Six of the tanks are said to store fuel oil and one is used for diesel fuel. The other tank is located at the southern end of the property between Buildings A and B. This tank also stored fuel oil. The oil tanks all have a concrete containment area at the fill points.

A-E, Inc. started its operations at this facility in 1890. In 1973 the company employed approximately 1,000 people and operated three shifts per day. The facility consists of seven buildings. Three of the buildings were used for the wire manufacturing process and one was used for storing finished product. One of the remaining three buildings was used for shipping (with a paint spray booth at one end), one was for machine parts storage, and the last building was the Hazardous



Solid Waste Management Units (SWMU)

1. Hazardous Waste Storage Building
2. Nonhazardous Waste Storage Area

Areas of Concern (AOC)

1. Underground Storage Tanks

Anaconda-Ericsson, Inc.
Sycamore, Illinois

Figure 2
FACILITY LAYOUT

Not to Scale
Source: Modified from A-E, Inc., 1980

Resource Applications, Inc.

Waste Storage Building (SWMU 1), of which half was used for general storage. The facility property consists of 27.55 acres of which 650,000 square feet is under roof. A-E, Inc. ceased operations at the facility in 1983. There is an asphalt parking lot along the south side of the facility. All of the buildings are still in existence, and the facility is presently owned by Sycamore Industrial Park Associates. The buildings are presently under lease to 11 tenants. Facility SWMUs are identified in Table 1. Very little information is available about the facility's history and ownership. The facility has been used for the wire manufacturing business since 1890. Before 1890 the facility property was open land. The facility was initially called the Chicago Insulated Company. It is not known when the name was changed to Anaconda-Ericsson, Inc. In approximately 1979, the magnet wire operation of A-E, Inc. was shut down and moved to Carrollton, Kentucky. In February 1983, the A-E, Inc. plant was shut down. A skeleton crew was left to handle the RCRA closure. A certification of closure letter by an independent registered professional engineer was submitted to the IEPA on November 16, 1983 (A-E, Inc., 1983). Anaconda-Ericsson, Inc. was the operator of the facility. The owner was Ericsson Radio Systems, Inc., who sold the facility to Sycamore Industrial Park Associates in 1985, which is the present owner of the facility. The facility is currently operating as a light industrial park; no hazardous waste activities are taking place on site. Current activities include assembly of compact disk jukeboxes, electronic dartboards, office equipment, and warehouse storage. RAI did not inspect all former manufacturing areas, as access was not available from all the current tenants. However, based on information obtained from former facility representatives, all SWMU areas were inspected.

2.3 WASTE GENERATING PROCESSES

The A-E, Inc. facility manufactured copper and aluminum wire and cable. The facility generated and managed the following waste streams: waste muriatic acid (D002), waste paint (D001), waste paint thinner (D001/F003), waste mineral spirits (D001), waste varnish (D001), waste chlorinated solvents (F002), waste phosphoric acid (D002), waste laboratory chemicals (waste code not known), waste synthetic oil (nonhazardous), waste polyvinylchloride/polyethylene (waste code not known), and waste wire cut-offs (nonhazardous). These wastes were generated during the manufacture of copper and aluminum wire and cable. Wastes generated at the facility are discussed below and are summarized in Table 2. Annual generation rates presented are based on 1980 waste generation data as listed in the RCRA Part A permit application. The annual waste generation rates

TABLE 1

SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Hazardous Waste Storage Building	Yes	Inactive; RCRA closure approved April 19, 1984.
2	Nonhazardous Waste Storage Area	No	Inactive; RCRA closure approved April 19, 1984.

Note:

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

TABLE 2

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Waste Muratic Acid/D002	Tinning Operation	1
Waste Paint/D001	Paint Operation Spool Stenciling	1
Waste Paint Thinner/D001, F003	Paint Operation Spool Stenciling	1
Waste Mineral Spirits/D001	Paint Operation Spool Stenciling	1
Waste Varnish/D001	Magnet Wire Coating Operation	1
Waste Chlorinated Solvents/F002	Parts Cleaning	1
Waste Phosphoric Acid/D002	One-Time Generation During Closure	Flushed to sanitary sewer after rinsing operation and proper pH adjustment
Waste Laboratory Chemicals/Unknown	Testing/ Experimentation	1
Waste Synthetic Oil/NA**	Wire Drawing Operation	Transported directly off site
Dirt and Copper Fines/NA**	Wire Drawing Operation	Transported directly off site

TABLE 2 (Cont'd)

SOLID WASTES

Waste/EPA Waste Code	Source	Primary Management Unit*
Waste Polyvinylchloride/Unknown	Extrusion Process	Shipped off site for recycling
Waste Polyethylene/Unknown	Extrusion Process	Shipped off site for recycling
Waste Wire Cut-Offs/NA**	Start/End of Various Operations	2

Notes:

* Primary management unit refers to a SWMU that currently manages or formerly managed the waste.

** Nonapplicable (NA) designates nonhazardous waste.

as listed in the Part A permit application are: F002 (1,200 pounds), F003 (3,200 pounds), F004 (5,000 pounds), D001 (15,000 pounds), and D002 (8,000 pounds). The F004 waste code is listed in the Part A permit application, although there is no documentation indicating that an F004 waste stream was managed at the facility. Specific generation rates for the individual waste streams as listed in Table 2 are unknown. The facility's history of waste generation and management, throughout the tenure of the various operations and owners, is unknown. All of the hazardous waste was stored in 55-gallon drums and the drums were stored in the Hazardous Waste Storage Building (SWMU 1). The ultimate disposition of the hazardous wastes generated is unknown, although they were reported to have been shipped off site to a licensed disposal facility. Copper and aluminum wire and cable production consists of wire drawing, reducing the size or diameter of the wire per specification, and insulating the wire with polyvinylchloride and polyethylene through a plastic extrusion process. The waste generated from the extrusion process occurred only during startup of the equipment and this waste was recycled.

A-E, Inc. generated waste muriatic acid (D002) from the tinning operation. This operation consisted of first cleaning the wire by passing it through a bath of muriatic acid, then through a burlap wiping operation, and finally through a tinning bath. The muriatic acid bath generated approximately one 55-gallon drum per month of waste muriatic acid (D002). The tinning bath was dumped out once every 3 months into a 55-gallon drum and then stored in SWMU 1 before it was shipped to a reclaimer.

A-E, Inc. generated waste paint (D001), waste paint thinner (D001, F003), and waste mineral spirits (D001) in a paint spray booth operation. This operation consisted of spray painting stencil-type identification on wire spools. The waste paint (D001) was generated by removing excess paint from the spray booth floor, walls, and empty paint containers. The waste mineral spirits (D001) were generated during the cleaning of paint laden equipment. The wastes were placed into a 55-gallon drum and then stored in SWMU 1.

A-E, Inc. generated waste varnish (D001), from the magnet wire coating operation. The operation consisted of drawing the wire through a varnish bath and then up and through a hot air drying tower. Depending on the requirements, this same operation would be repeated as many as five times. The varnish bath container size was approximately 8 cubic feet. The bath was emptied

quarterly, and the waste varnish was poured into a 55-gallon drum. This waste was stored in SWMU 1.

A-E, Inc. generated waste chlorinated solvents (F002). This waste was generated during parts cleaning operations. The spent solvents were placed in 55-gallon drums and stored in SWMU 1. This waste was transported by Safety-Kleen Corporation with its ultimate disposition unknown.

A-E, Inc. had a one-time generation of waste phosphoric acid which occurred during the plant closure operation. The phosphoric acid was used to clean out various process tanks which went through a water rinsing operation. After proper pH adjustment the rinse water was flushed to the sanitary sewer.

A-E, Inc. generated waste laboratory chemicals. The waste consisted of various combinations of waste chemicals listed in Table 2. The waste was stored in SWMU 1. The size of the storage containers is unknown.

A-E, Inc. generated waste synthetic oil during the wire drawing operation. A solution was used which consisted of 60 percent water and 40 percent synthetic oil with an appearance like "Crisco" or lard. The solution was used as a combination coolant/lubricant for the wire and dies. The dies were made of tungsten carbide/diamonds which came in various sizes depending upon the wire size requirement. The dies were sent to Fort Wayne, Indiana to be polished. The dies made of tungsten carbide lasted about eight hours and the dies made of diamonds and various metal alloys lasted approximately three months. The wire drawing bath, located at the process area, had a capacity of approximately 3,000 gallons. The coolant/lubricating (waste synthetic oil) solution was removed from the tank once each year. The solution was pumped from the tank directly to a tanker truck. The tanker truck would transport it directly to a reclaimer. A mixture of dirt and copper fines which settled out of the solution to the bottom of the tank was scooped out and placed into 55-gallon drums. The drums were immediately removed to railcars which transported them to a reclaiming operation.

A-E, Inc. generated waste PVC and polyethylene during startup of the extrusion process. The purpose of the extrusion process was to insulate the copper and aluminum wire with PVC and

polyethylene plastic covering. The process consisted of applying heat, thus melting the plastic, extruding onto the wire, and cooling. During the initial startup approximately 100 pounds of waste plastic was generated in the form of approximately 8-inch diameter disks. This material was transported to a reclaiming operation in a 37-cubic-foot "Gaylord" type cardboard box. The material was reground and returned to the facility.

A-E, Inc. generated waste wire cut-offs at the start and end of the various wire and cable manufacturing operations. The storage area was located in the southeastern corner of Building C, identified as the Nonhazardous Waste Storage Area (SWMU 2). The waste was stored in 5-foot by 3-foot by 4-foot-high wood boxes which were removed when full, placed in a railcar, and taken to a reclaiming operation.

As initially described above, the ultimate disposition of the wastes is unknown.

2.4 HISTORY OF DOCUMENTED RELEASES

There is no history of documented releases to ground water, surface water, air, and on-site soils, at the A-E, Inc. facility. There was no visual evidence of past releases observed during the VSI.

2.5 REGULATORY HISTORY

A-E, Inc. submitted a Notification of Hazardous Waste Activity to EPA on August 14, 1980 (A-E, Inc., 1980a). The facility submitted a RCRA Part A permit application on November 16, 1980 (A-E, Inc., 1980b). The application listed the following waste codes and capacities: F002 (1,200 pounds per year), F003 (3,200 pounds per year), F004 (5,000 pounds per year), D001 (15,000 pounds per year, and D002 (8,000 pounds per year). The application also listed the process code S01 (container storage). There have been no revisions to the Part A permit application originally submitted on November 16, 1980. The F004 waste code is listed in the Part A permit application, although there is no documentation indicating that an F004 waste stream was managed at the facility. The facility operated as a large-quantity generator and storage facility, storing hazardous wastes for more than 90 days.

A closure plan was submitted to IEPA by A-E, Inc., on February 16, 1983. This closure plan was submitted for the entire facility, which had ceased operations in February 1983. The closure plan was approved on July 8, 1983 with the stipulation that the facility be closed in accordance with the specifications in the approved closure plan and that the closure be certified by an independent registered professional engineer (IEPA, 1983b). The certification of closure letter from the owner and operator was submitted to the IEPA on November 16, 1983. This letter included the certification of closure from the independent registered professional engineer (A-E, Inc., 1983). Closure was approved by IEPA on April 19, 1984, and the status was changed to "Closed Facility" (IEPA, 1984b). It is not known whether the Part A permit was officially withdrawn.

In the past, A-E, Inc. has not had RCRA compliance problems. Inspections were conducted in conjunction with closure activities on April 28, 1983 and April 9, 1984 (IEPA, 1983a, 1984a).

No air permits for the facility were present in the EPA Region 5 files. There was no evidence of any odor complaints from area residents. No information is available regarding sanitary sewer discharge permits. The facility's Part A permit application indicated that the facility was discharging to waters of the United States but there was no documented information indicating that a National Pollutant Discharge Elimination System (NPDES) permit was required.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the A-E, Inc. facility.

2.6.1 Climate

The climate in DeKalb County is typically continental with cold winters, warm summers, and frequent brief fluctuations in the temperature, humidity, cloudiness and wind direction (Ruffner, 1985). The average daily temperature is 48.6°F. The lowest average daily temperature is 10.6°F in January. The highest average daily temperature is 84.9°F in July.

The total annual precipitation for the county is 35.2 inches (USDA, 1978). The mean annual lake evaporation for the area is about 30 inches (USDC, 1968). The 1-year, 24-hour maximum rainfall recorded in the area over the last 25 years is 5.06 inches (Ruffner and Bair, 1985).

The prevailing wind is from the south-southwest and the average wind speed is 10.0 miles per hour. Average wind speed is highest in March at 11.8 miles per hour from the west-northwest (NOAA, 1990). The wind direction and speed were recorded from Rockford, Illinois, also a National Weather Service office, which is located 30 miles to the northwest. The DeKalb weather service substation has no recorded wind information.

In winter, about one-half of the precipitation, or 10 percent of the annual total, falls as snow. During the fall, winter, and spring, the pattern of precipitation tends to be more uniform over both time and distance, whereas in summer, rainfall is often locally heavy and variable.

2.6.2 Flood Plain and Surface Water

The A-E, Inc. facility is located in a Zone C flood plain, that is, an area of minimal flooding outside both the 500-year and 100-year flood plains (FEMA, 1983). The nearest surface water body is a pond, with a surface area of approximately 7.5 acres, located approximately 300 feet north of the facility. The pond was originally a gravel pit and is owned by the City of Sycamore. The pond is not used for any recreational or industrial purposes. It is located on city property and there are no industrial buildings on the property. The surface water body does not discharge at any point. There are two other smaller surface water bodies in the area also formed from gravel pits. One of these surface water bodies is to the north of the pond mentioned above and one is to the east. The next nearest surface water body, the Kishwaukee River, is located approximately 1,300 feet northeast of the facility and is used for industrial and recreational purposes. This surface water body discharges into the Rock River, which ultimately discharges into the Mississippi River. Surface water drainage at the facility is through a storm sewer system to the northeast toward the Kishwaukee River. No further description is available for the surface water drainage. There are no other major surface water bodies in the area.

2.6.3 Geology and Soils

The facility is underlain by soils of the Drummer silty clay loam series, which consists of nearly level, poorly-drained soils. The surface layer is black and very dark gray silty clay loam about 18 inches thick. The subsoil is approximately 32 inches thick and is lighter gray silty clay loam. The underlying material is gray and dark brown sandy clay loam and silt loam. The soils are moderately permeable, with high available water capacity; surface runoff is very slow, causing occasional ponding (USDA, 1978).

No site-specific information was available regarding drift or bedrock geology beneath the facility, so regional information is presented below. During the Wisconsinan glacial events, the Sycamore area was covered by glaciers. The ice deposited unsorted rock debris in a clay matrix, known as till. The bulk of the glacial deposits in the region are tills, although some glacial outwash and modern stream deposits (sands and gravels) are also present. The exact thickness of the drift deposits is not known, but is thought to be between 100 and 200 feet (Hackett and Bergstrom, 1956).

The uppermost bedrock unit beneath the facility is the Maquoketa Shale of Ordovician age. This consists of green to blue shale with some intercalated limestone and dolomite beds. The Maquoketa unit is thought to be approximately 100 feet thick, and is underlain by the Ordovician Galena-Platteville dolomites and limestones. The latter unit is about 300 feet thick, and is largely dolomite with a shaly band near the middle and some limestone beds in the lower portion. The Glenwood-St. Peter sandstone and Prairie du Chien dolomites, both of Ordovician age, lie beneath the Galena-Platteville unit. Beneath the Ordovician rocks are Cambrian dolomites, sandstones and shales, including the Ironton-Galesville and the Mount Simon sandstones, which are both important aquifers. Precambrian crystalline basement underlies these rocks. The thickness of and depths to the Cambrian and Precambrian rocks are not known (Hackett and Bergstrom, 1956).

2.6.4 Ground Water

No site-specific information was available, so regional ground water information is presented here. Sand and gravel drift deposits are important as a ground water source in some areas, but deposits are scattered and discontinuous. Drilled ground water wells in the Sycamore area obtain

ground water from the Galena-Platteville dolomite, and the limestone and dolomite beds of the Maquoketa unit are locally water-yielding. Deeper wells may draw upon the aquifers of the Glenwood-St. Peter, Ironton-Galesville, and the Mount Simon rock units, although there is a significant reduction in permeability and water quality with depth (Hackett and Bergstrom, 1956)

2.7 RECEPTORS

The facility occupies 27.55 acres in an industrial and residential area in Sycamore, Illinois. Sycamore has a population of about 9,900.

The facility is bordered on the north by city property, which contains a 7-acre pond (gravel pit filled with water), with one house located between the property and the facility; on the west by a residential area, open land, and Northern Illinois University Engineering School; on the south by a residential area, a handicapped persons training building, and an abandoned railroad line; and on the east by a small residential area, a section of the Kishwaukee River, and light industry. The nearest school, Central School, is located about 0.2 mile south of the facility. Facility access was controlled by fences and security guards. It is not known if video monitoring or any other security features were utilized, nor is it known if the security guards were on duty 24 hours per day.

The nearest surface water body, old gravel pit pond, is located approximately 300 feet north of the facility and is not used for any particular purpose. Other surface water bodies in the area include the Kishwaukee River which basically runs east and west but bends somewhat so that it comes within 1,300 feet northeast of the facility.

Ground water is used as a drinking and municipal water supply. The nearest drinking water well (marked #6 on Figure 1) is located 930 feet southwest of the facility (City of Sycamore, 1992). There are other city wells in the area of the facility, as shown in Figure 1. There is no site-specific information available, but based on the location of the river, the facility, and the wells, it is assumed that the wells are upgradient of the facility. The nearest industrial water well is not known.

Sensitive environments are not located on site. The nearest wetland area is located approximately 2 miles west-northwest of the facility. There are no critical habitats, national parks, or state parks located within 2 miles of the facility.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU: description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and RAI observations.

SWMU 1 **Hazardous Waste Storage Building**

Unit Description: The Hazardous Waste Storage Building was a separate brick building located on the north-central area of the facility. The building was divided into two parts, of which one-half was used for storing general items, such as large wooden spools, and the other half was used entirely for storing hazardous wastes. The dimensions of the building are 42 feet by 42 feet with a concrete floor and a berm dividing the two halves and berms at the door openings. No floor drains were observed in the building. The process design capacity for the unit is 18,750 gallons or 340 55-gallon drums. (see Photographs No. 1 and 2)

Date of Startup: The starting date for the unit is unknown, but it is estimated to have been used since at least 1973 (A-E, Inc., 1992).

Date of Closure: The unit was closed on November 16, 1983 as part of a RCRA facility closure. IEPA approved closure activities on April 19, 1984 (IEPA, 1984b).

Wastes Managed: The unit managed waste muratic acid (D002), waste paint (D001), waste paint thinner (D001, F003), waste mineral spirits (D001), waste varnish (D001), waste chlorinated solvents (F002), and waste laboratory chemicals (code unknown). The waste was removed from the facility by a licensed disposal firm, but the ultimate disposition of this waste is unknown.

Release Controls:	This unit is a separate brick building, half for general storage and half for hazardous waste storage. The two halves are separated by a 12-inch-high concrete berm. The entire floor is constructed of concrete with concrete berms at the door openings. There are no floor drains in the building.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit is closed. At the time of the inspection, there were no drums in the building. There were a few cracks in the concrete floor. No evidence of release was noted (see Photographs No. 1 and 2)
SWMU 2	**Nonhazardous Waste Storage Area**
Unit Description:	The Nonhazardous Waste Storage Area was located in the southeast corner of Building C. The unit was used to store scrap wire. The storage area was approximately 12 feet by 20 feet in size and consisted of a concrete floor with a brick wall on two sides. The capacity of the unit is not known. No floor drains were located in the area.
Date of Startup:	The startup date for the unit is unknown, but it is estimated to have been used since at least 1973 (A-E, Inc., 1992).
Date of Closure:	The unit was closed on November 16, 1983 as part of a facility RCRA closure. IEPA approved closure activities on April 19, 1984 (IEPA, 1984b).
Wastes Managed:	This unit managed nonhazardous waste wire cut-offs. The ultimate disposition of this waste is unknown, except that it was shipped to a reclaimer by railcar.

Release Controls:	The unit was inside a building with a concrete floor.
History of Documented Releases:	No releases from this unit have been documented.
Observations:	The unit is closed. No waste remains in the area. No evidence of release was noted.

4.0 AREAS OF CONCERN

RAI identified one AOC during the PA/VSI. This AOC is discussed below; its location is shown in Figure 2.

AOC 1 Underground Storage Tanks

There are eight Underground Storage Tanks (USTs) at the facility. It is estimated that these tanks have been in place since at least 1973. There is no documentation indicating that the tanks have been emptied; they are currently inactive. Seven of the tanks were used for fuel oil and one for diesel fuel. Six of the oil tanks have a common concrete containment area. The other oil tank has its own concrete containment area. The diesel fuel tank does not have a containment area. The pump used for fueling vehicles has been removed. The capacity of the tanks is unknown. The USTs are identified as an area of concern because they are at least 19 years old and there is no documentation indicating that they have been tested recently. There is no evidence of any leak detection devices. According to facility representatives, no closure activities have taken place or are planned for the tanks. The tanks were not addressed in the 1983 facility closure plan.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and one AOC at the A-E, Inc. facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is presented in Section 3.0. The AOC is discussed in Section 4.0. Following are RAI's conclusions and recommendations for each SWMU and AOC. Table 3 summarizes the SWMUs and AOC at the A-E, Inc. facility and recommended further actions.

SWMU 1 **Hazardous Waste Storage Building**

Conclusions: The unit formerly stored 55-gallon drums of hazardous waste prior to RCRA closure in 1983. The unit has a no potential for release to ground water, surface water, air, and on-site soils, as all wastes have been removed, the unit has undergone RCRA closure, and no evidence of release was observed. The past potential for release to the environmental media was low, as waste was managed indoors on a sound concrete floor.

Recommendations: RAI recommends no further action for this unit.

SWMU 2 **Nonhazardous Waste Storage Area**

Conclusions: The unit formerly stored scrap wire in wooden boxes, indoors, on a concrete floor. The unit has a no potential for release to ground water, surface water, air, and on-site soils, as all of the waste was nonhazardous and has been removed. The past potential for release to the environmental medial was low, as the unit was located indoors and managed nonhazardous waste.

Recommendations: RAI recommends no further action for this unit.

TABLE 3

SWMU AND AOC SUMMARY

SWMU	Dates of Operation	Evidence of Release	Recommended Further Action
1. Hazardous Waste Storage Building	At least since 1973 to 1983	None	None
2. Nonhazardous Waste Storage Area	At least since 1973 to 1983	None	None

AOC	Dates of Operation	Evidence of Release	Recommended Further Action
1. Underground Storage Tanks	At least since 1973 to present	None	Under proper authority, conduct tank testing or soil sampling

AOC 1 **Underground Storage Tanks**

Conclusions: There is no evidence of any soil testing of the area or integrity testing of the tanks. The tanks were not addressed in the 1983 facility closure. The potential for release to environmental media is detailed below.

Ground Water and On-Site Soils: Moderate to high. There is no evidence of any testing, past or present, hence the tanks could be leaking. Any release would contaminate on-site soils and could affect the ground water.

Surface Water and Air: Low. The units are situated below grade.

Recommendations: RAI recommends that, under proper authority, tank testing or soil sampling be conducted.

REFERENCES

Anaconda-Ericsson, Inc. (A-E, Inc.), 1980a. Notification of Hazardous Waste Activity, August 14.

A-E, Inc., 1980b. RCRA Part A permit application, November 16.

A-E, Inc., 1983. Letter to IEPA certifying the closure from the owner and operator, and independent registered professional engineer, October 29.

A-E, Inc., 1992. Telephone discussion (conference call) between attorneys representing A-E, Inc., Art Marshalla (RAI), Alan Supple (RAI), and Joseph Amerin, former employee of A-E, Inc., March 30.

City of Sycamore, 1992. Discussion by telephone with Lyle Doty of the City of Sycamore Building and Zoning Department in reference to surface water, wells and other environmental factors pertaining to the A-E, Inc. facility.

Federal Emergency Management Agency (FEMA), 1983. Federal Insurance Program, National Flood Insurance Program, City of Sycamore, Illinois.

Hackett, J.E., and R.E. Bergstrom; 1956. "Ground Water in Northern Illinois." Illinois State Geological Survey, Circular 207, Urbana, Illinois.

Illinois Environmental Protection Agency (IEPA), 1983a. Memorandum to File from P.D. Lopinto regarding site inspection, April 28.

IEPA, 1983b. Letter to Anaconda-Ericsson, Inc. indicating approval of the closure plan for the facility, July 8.

IEPA, 1984a. Observation Report - RCRA closure verification, April 9.

IEPA, 1984b. Letter to Mark Valentine, Anaconda Wire & Cable Company from Lawrence W. Eastep, approving closure activities, April 19.

National Oceanic and Atmospheric Administration (NOAA), 1990. Local Climatological Data: Annual Summary with Comparative Data: Rockford, Illinois

Ruffner, J.A., 1985. Climates of the States, Vol. 1, Gale Research Co., Detroit, Michigan.

Ruffner, J.A., and Frank E. Bair, 1985. Weather of U.S. Cities, Vol. 1, Gale Research Co., Detroit, Michigan.

U.S. Department of Agriculture (USDA), 1978. Soil Survey of DeKalb County, Illinois. Illinois Agricultural Experiment Station, May.

U.S. Department of Commerce (USDC), 1968. Climatic Atlas of the United States. U.S. Government Printing Office, Washington, D.C.

U.S. Geological Survey (USGS), 1980. 7.5 minute topographic series: DeKalb, Illinois quadrangle.

ATTACHMENT A

VISUAL SITE INSPECTION SUMMARY AND PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Anaconda-Ericsson, Inc. (A-E, Inc.)
Sycamore, Illinois
ILD 062 406 608

Date:	April 3, 1992
Facility Representatives:	Miles Berman, Attorney (A-E, Inc.) Sean Bezark, Attorney (A-E, Inc.) Mr. Robert Boey, Partner, Sycamore Industrial Park Associates
Inspection Team:	Arthur Marshalla, Resource Applications, Inc. (RAI) Alan Supple, RAI
Photographer:	Alan Supple
Weather Conditions:	Calm, sunny, temperature about 40°
Summary of Activities:	The visual site inspection (VSI) began at 10:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the A-E, Inc. facility's past solid waste generation, and release history. Most of the information was exchanged on a question-and-answer basis. A-E, Inc. representatives were unable to provide the inspection team with any documents. Very little information was available. The VSI tour began at 1:00 p.m. The inspection team walked through the former facility observing where past manufacturing processes took place. There was one former hazardous waste SWMU, in a small building (SWMU 1). Based on observation, the unit was in good condition, except for some cracks in the concrete floor. It was difficult to observe any possible past releases in the manufacturing area because as many as eleven companies have moved in, on a lease basis, and are all performing their own operations. There was one area of concern which consisted of eight USTs. The USTs are not being used but are still in existence. The tanks have been in place since at least 1973. The tour concluded at approximately 3:00 p.m., after which the inspection team held an exit meeting with the two attorneys representing A-E, Inc. and the new owner of the facility. The VSI was completed and the inspection team left the facility at 3:30 p.m.

Photograph No. 1 Location: SWMU 1
Orientation: East Date: 4/3/92
Description: This is the southern half of the Hazardous Waste Storage Building showing the concrete floor (note the bird droppings) and brick walls. Major cracks in the floor are not apparent.

Photograph No. 2 Location: SWMU 1
Orientation: Northeast Date: 4/3/92
Description: This is the northeastern section of the area used for storage of hazardous waste in drums showing the concrete floor and the berm which divides the building into two parts. Major floor cracks are not apparent.

Photograph No. 3 Location: AOC 1
Orientation: North Date: 4/3/92
Description: Location of diesel fuel UST with a 9-foot by 18-foot concrete pad at the ground surface. View also shows the location of the former pump used for fueling trucks.

Photograph No. 4 Location: AOC 1
Orientation: North Date: 4/3/92
Description: Six fuel oil USTs with 25-foot by 25-foot concrete containment area, located in the north central area of the facility.

Photograph No. 5 Location: AOC 1
Orientation: Northwest Date: 4/3/92
Description: Location of fuel oil UST with a 25-foot by 15-foot concrete containment area.

ATTACHMENT B

VISUAL SITE INSPECTION FIELD NOTES

10:15 a.m. Anaconda - Ericsson 4/3/92

Robert Boey
John J. Tatky

≈ 40°, sunny

Shut down in 1983.

One point 1,000 people employed

Anaconda purchased Chicago Insulated Wire Co.

Owned by Sycamore Industrial Park Associates. Robert Boey is one of partners - there are two. Midd Kreiger is other partner.

Partner bought facility from Anaconda in 1995 - re plans to develop into an industrial park

11 tenants now.

Over 300 jobs total

650,000 square feet under roof.

35 acres of land

1983-85 - shutdown crew.

1962-85 worked for Anaconda. Engineering. Corp. Mgr. of Engineering.

Anaconda Co.

Anaconda Wire & Cable Company

Storm sewer discharges to Kishwaukee River.

City pond - NW

Fencing - 24hr; not known.

A.S.

≃ 8 USTs

Photo Log

1. NE Wash Hose Cracks in floor Rust stains. Concrete Berm. Floor in good cond
2. E Pad 9'x18'
3. N ? Diesel fuel UST Concrete pad Pump-Lift truck-fueling? Has not changed since.
4. N Fuel oil USTs - Containment - concrete for spills during fill 6 USTs Inactive
5. NW Fuel oil UST - containment 25'x15' used for heating purposes

11,000 pop. Syc more

S - BR & residences to S

W - NIU Engineering Sch across the road Pond on NW

N - Res. then N. Ave. NW - Light industry

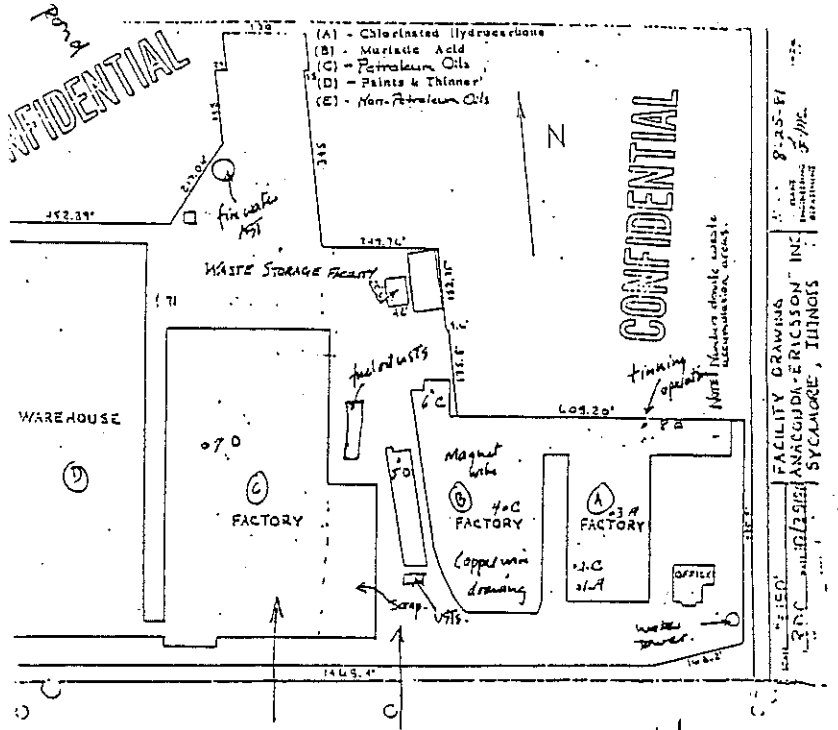
E - Light industry. Residential.

Post 1985

AS

• Allen's Notes

Notes Allen's Notes



Al wire stranding

Copper & Al insul, bare, tin coated. Segregated into gaylord, wooden boxes. (1000 lb) from plastic. Very quick turnaround. Cardboard boxes onto train.

Listner - copper reclaimer

J

A5.

F001
F004
F017 - paint-related
F005
} halogenated solvents chlorinated & non-chlorinated

D001

D002

Copper & Al wire & cable

S01 18,750 gal

T01 500 gal (should be S02 ??) never ham

KD 062 406 608

S01 - 55-gal drum 18,750 (300 drums)

Closure Plan - March 28, 1983 REJECTED.

Grease & petroleum from wire drawing

American Waste Processing - Maywood IL

2 8,000 gal
1 6,000 gal
} tanks for grease. (B)

Underground pit containing oil pumped. (B)

20 gals of thinner in spray booth (B)

Lab.

(C) 250 gal tanks of water on/ 13 drums.

(C) 3 Phosphoric acid tanks (4' x 4' x 4')

+ AS

10th Friday

Joe
Miles

Wire manuf. plant since 1890

Feb 1978 3 prod

Magnet wire: Cu & Al coated with varnish, enamel tin
for transformers & alternators

Cu & Al wire: (outside) Com. Ed wire. Either coated or not

Inside wire:

Some bare copper & Al wire went out.

Some PVC, polyethylene, varnishes, enamels

Company split up - magnet wire op facility moved to Carollton KY 1978-79

Copper conductor drawn

Wire drawn through a varnish bath

Wire pulled up through tower - apply heat (warm air in tower) dries coating 4-5x coating & drying

Rewound on other spools. Shipped

Cleanup times - change bath

Solvents generated from cleaning out - Mineral spirits.

55-gallon drums - No idea of rate of generation

Taken to "Wax House".

Copper drawing soln - water & synthetic oils (not petrol. based) 60% water

- used to be water + animal fat

Scrap wire - cut-offs sent to a recycler - reclaimed.

Wooden boxes 5' x 3' x 4' tall. Put in scrap area.

Small tin bath - kitchen sink size.

1977 - removed mur. acid → went to Blackstone fluor. Became inert after use

Tin coating: Muriatic acid

Bare copper off spool - Through a roller into tank of mur. acid - Wiped on a burlap blotter - Then dipped ~~on~~ into molten tin

Replace burlap & tank

55G drums of muriatic acid. Not a big volume item. Mur. drums stored in wax house.

Burlap - not known disposal method - not known.

clinkers (waste stream).

Tin dross sent to a recycler.

~~Wire~~ Scoop tank out into 55G drum. Came out as a solid.

Not sure how it was managed.

Accumulate a drum's worth

Dump the tank every so often (quarterly) + continual skimming.

A lot starts off same way - drawing.

Drawing

Copper - (B) Copper rod received on railcars. Wire pulled down into different dies & shapes. Wire drawing solution (~~Stoddish~~ synthetic) Looks like "Crisco" R-H-Miller & Apex supplied synthetic oils

PA?? Phila PA

Very large wire drawing solution tank 3,000 + gallons

Copper sludge -

1 yr - ~~removed~~ Bottom of tank. Solids settling pit.

55 gall drum to copper refiner. Dirt & copper fines.

Copper went straight out in railcars

Solution - used as a coolant for drawing process

Die cleaning — lubricant

Dies - tungsten carbide } = drawing dies. Last 6-8 hours

diamonds } Last 3 mos.

Send dies out to be polished.

Fort Wayne Wire Die, Ft. Wayne, IN.

Either shipped as bare wires (flame retardant) inside

or (A) - PVC insulation } apply heat, melt & extrude

(C) - polyethylene insulation } outside

Receive premixed PVC & p.e. from Union Carbide

Bleedout - melting down - initial startup - collect in ≈ 100 lbs.

About size of wastebasket. "Cow droppings."

40"x40"x40" gaylord box. Sent to reclaimer in cardboard boxes - 1 box per wk.

↓ don't recall name

Go shop it up, regrind - send back in useful form

When coated - sent out to customer

May twist wire together

Aluminum -

Drawn in Building C

Petroleum-based oil used as lubricant and coolant.

About 3,000 gallons

Tank cleaned out approx. every 2 yrs

No sludge to remove

Air hose in bottom of Al oil tank. Compressed air used to agitate dirt for pump out.

May go out cable twisted / bare or insulation
Same PVC - polyethylene coating proven.

Fac closed Feb 1983
Left March 1984.

Mar. acid in 55 gal drums.
No bulk storage of oil.
Gas is tank trucks.

No underground storage.
Fuel oil tank = underground. Number & site not known.
Boilers - nat. gas or oil.
Not known whether removed.

City Water & sewer. Sycamore obtained water from wells.
No WWTS
City sewer
Plugged drain
Sanitary sewer.

No idea about NPDES
Kishwaukee River

No releases that he has heard of

Chicago Insulated Wire Co. - way back

Up around 1,000 people in 1945 ish
500-600 employees in 1973 3 shifts Sat & Sun opt. depending on the work schedule
1982 - approx 200 to 250 employees.

3/3/92

• Visit:- American Bare Conductor, Inc.

Closed Facility:- 1983 @ 1-pt-1000 people.

1890 - Chicago Insulated Wire, ~~Inc.~~ Co.

1942 to Closure

Anaconda - Ericsson, Inc. - Closed 1983

Buy 1985 Sycamore Industrial Park - Present

35 Acres - 650,000 ft^2 Under Roof.

8 - UST (Before 1985).

Pitwaste - Wax House - Concrete Floors (Four Settling Gravel)
Berms + Walls (Southern Half of Barn)

ASH.

A-E, Inc.

① Copper Wire (South part of Factory B)

Wire drawing

Drawing soln.
60% H2O/40% Synthetic (Crisco) — Coolant/Lubricant
Atlas
Philadelphia

Large Tank w/ Waste emptied once each year & pumped out — Liquid pumped to Tank Truck
Copper Mud / sludge — 55 Gal. Reclaimer went direct to Railcar

② Copper (Insulating) → to Client Dow M or Factory
A — PVC — Inside
C — Polyethylene Insulation — outside

Bleed Out Waste Stream (Initial Startup)
100# @ Start-up — [illegible] / Gaylord (approx 1-wk) — Less than 70 days
CU/AL

Aluminum Insulation → Bldg 'C' → Drawing

Al-Wire Drawing
Petroleum Base Oil → For Cooling/Lubrication
Tank → [illegible] every 2 years.

Extruder Insulating — PVC / Poly — Same as Copper Wire

FLWD — Transporter
Maywood 1979 and On
Saftey Kleen — Solvents
Part Cleaner

AJH

10

A-E, Inc.

• Chlorinated H.C. — ?

• Bulk Storage/Oil Storage (Products) — No Storage on S

Fuel Oil Tanks — Underground - Size ?

Removed — ?

Spills — None.

• Used City Water — From Sycamore. (wells)

W.W.T.S. — No.

Discharge to Sewage. (Floor Drains Plugged)

Site Runoff — ?

Kissell Ave. River

4 Apr

3/30/92.
(By Phone)

Anaconda-Ericsson, Inc.

- Conference Phone Call w/ Joe Amerin (Former AE Inc. Employee) + Attorney.

- Call is in Reference to Site Information @ A-E, Inc.

· Products Manufactured - Copper/Aluminum Insulated Wire/Cable.

· Manufacturing Process Consists of: Drawing/Stranding/Insulating.

Magnate - Draw Wire → Coat w/ Varnish Bath thru ovens (dryers) └(2'x2'x1')

· Clge varnish/Enamel } 4 to 5 55 Gal. Drums quarterly
· Solvents · mineral spirits

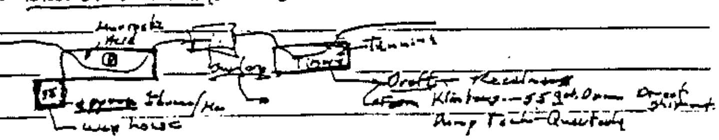
~~B^c Magnate Wire~~

Copper Drawing Soln. - Water/Synthetic Oil (Crisco)

Sold Magnate - 1979 - Carrollton, Kentucky

· Wire Cut Offs → 6'x3'x4' Tall (High) Wood Boxes → Rail Car / Redonna

· Tinning Operation → 8D - Muriatic Acid - 1977 Stopped + went to Blackstone Flux (Inert)



12 ATD

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: _____

EPA I.D. NUMBER: _____

LOCATION CITY: _____

STATE: _____

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

	YES	NO
° Landfill	____	____
° Surface Impoundment	____	____
° Land Farm	____	____
° Waste Pile	____	____
° Incinerator	____	____
° Storage Tank (Above Ground)	____	____
° Storage Tank (Underground)	____	____
° Container Storage Area	____	____
° Injection Wells	____	____
° Wastewater Treatment Units	____	____
° Transfer Stations	____	____
° Waste Recycling Operations	____	____
° Waste Treatment, Detoxification	____	____
° Other _____		

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

_____

_____

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_____

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

   Please provide the following information

   a. Date of release
   b. Type of waste released
   c. Quantity or volume of waste released
   d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

_____

_____

_____

_____

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

_____

_____

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I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

_____
Typed Name and Title

_____ _____
Signature Date